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PROPOSED

Rio Puerco

Resource Management Plan

OCTOBER 1985

US DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
ALBUQUERQUE DISTRICT
RIO PUERCO RESOURCE AREA

BLM-NM-PT-85-014-4410

March 3, 1849

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
3550 Pan American Freeway, N.E.
P.O. Box 6770
Albuquerque, New Mexico 87107

IN REPLY REFER TO
1616 (037)

September 1985

Dear Reader:

Enclosed for your review is the Proposed Rio Puerco Resource Management Plan (RMP)/Final Environmental Impact Statement (EIS). This document analyzes the impacts of managing the public land in the Rio Puerco Resource Area in Bernalillo, Cibola, Torrance, and Valencia Counties, most of Sandoval County, and small parts of McKinley and Santa Fe Counties, New Mexico.

This Proposed RMP/Final EIS contains the Proposed Plan. The Proposed Plan is a modified version of the Preferred Alternative published in the Draft RMP/EIS in March 1985. All parts of the Proposed Plan may be protested. Protests should be sent to the Director, Bureau of Land Management, 18th and C Streets NW, Washington, D.C., 20240, within thirty days from the filing date of the Proposed RMP/Final EIS. The protest should include the following information: (1) the name, mailing address, telephone number, and interest of the person filing the protest; (2) a statement of the issue or issues being protested; (3) a statement of the part or parts being protested; (4) a copy of all documents addressing the issue or issues that were submitted during the planning process by the protesting party or an indication of the date the issue or issues were discussed for the records; and (5) a concise statement explaining why the BLM New Mexico State Director's decision is wrong.

At the end of the thirty-day protest period, the Proposed Plan, excluding any portions under protest, will become final. Approval will be withheld on any portion of the Plan under protest until final action has been completed on such protest. The approval process and the approved Plan will be published with the Record of Decision.

This Proposed RMP/Final EIS was prepared using the comments received through the review process on the Draft RMP/EIS. Because the changes suggested through the public review process did not require a major rewrite of the Draft and substantial cost savings could be realized by reprinting only the responses to comments and the corrections and modifications, the Draft RMP/EIS has been incorporated into this Proposed RMP/Final EIS by reference. Thus, this document must be used in conjunction with the Draft RMP/EIS. A limited number of copies of the Draft are still available from the BLM, Rio Puerco Resource Area, 3550 Pan American Freeway NE, P.O. Box 6770, Albuquerque, NM 87197-6770.

Sincerely,

Herrick E Hanks

Herrick E. Hanks
Rio Puerco Resource Area
Manager

NOTICE

This is the Proposed Resource Management Plan/Final Environmental Impact Statement for the Rio Puerco Resource Area. This Proposed RMP/Final EIS incorporates the Draft RMP/EIS by reference and includes a summary of the Draft, the Proposed Plan, changes to the Draft resulting from public review and comment, the environmental consequences of the Proposed Plan, a record of public comment on the Draft, and the responses to those comments. All substantive changes to the Draft are printed in bold face. Copies of the Draft RMP/EIS are available from the BLM Rio Puerco Resource Area, 3550 Pan American Freeway NE, P.O. Box 6770, Albuquerque, New Mexico 87197-6770.

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PROPOSED RIO PUERCO RESOURCE MANAGEMENT PLAN AND FINAL ENVIRONMENTAL IMPACT STATEMENT

OCTOBER 1985

PREPARED BY:
US DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

RIO PUERCO
RESOURCE MANAGEMENT PLAN
AND
ENVIRONMENTAL IMPACT STATEMENT

Draft ( ) Final (X)

The United States Department of the Interior, Bureau of Land Management

1. Type of Action: Administrative (X) Legislative ( )

2. Abstract: This Proposed Resource Management Plan and Final Environmental Impact Statement describes and analyzes the Proposed Rio Puerco Resource Management Plan for managing the public lands and resources in the Rio Puerco Resource Area, New Mexico. The Proposed Plan is the Balanced Management Alternative from the Draft, slightly modified.

3. For further information, contact:

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Charles W. Luscher

Charles W. Luscher
State Director
New Mexico State Office

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SUMMARY

The Draft Rio Puerco Resource Management Plan (RMP) and Environmental Impact Statement (EIS) was released for a ninety-day comment period in March, 1985. Based on public input and analysis of the issues, the Preferred Alternative of the Draft, slightly modified, has been selected as the Proposed Resource Management Plan. Because the changes suggested through the public review process did not require a major rewrite, and substantial cost savings could be realized by printing only the responses, the comments, and the corrections and modifications, the Draft RMP/EIS has been incorporated into this Proposed RMP/Final EIS by reference. Thus, this document must be used in conjunction with the Draft RMP/EIS. Any text not noted "in the Draft" is reprinted in this document.

This Proposed Rio Puerco Resource Management Plan and Final Environmental Impact Statement identifies and analyzes the future options for managing the 896,490 acres of public land and 1,962,753 acres of Federal mineral estate administered by the Bureau of Land Management (BLM) through the Rio Puerco Resource Area (RPRA) office in the Albuquerque District. Located in central and north-central New Mexico, the RPRA encompasses 8,620,838 acres, including all of Bernalillo, Cibola, Torrance and Valencia Counties, most of Sandoval County and small parts of McKinley and Santa Fe Counties. The lands and resources of the RPRA are described in detail in Chapters 1 and 3 in the Draft; Map A in the Draft displays the surface ownership pattern.

The Rio Puerco RMP is being prepared using the BLM planning regulations issued under the authority of the Federal Land Policy and Management Act of 1976. When completed, the RMP will provide a comprehensive framework for managing and allocating public land and resources within the RPRA during the next ten to twenty years. The contents of this Proposed RMP/Final EIS document are primarily focused on resolving seven key resource management issues. These issues are: (1) Special Management Areas; (2) Off-Road Vehicle Designation; (3) Vegetative Uses, on public lands not covered by previous grazing EIS's; (4) Land Ownership Adjustments, particularly in Torrance County and the Cuba-La Jara area; (5) Fuelwood Supply, in Sandoval County; (6) Rights-of-Way Corridors, also in Sandoval County; and (7) Coal Leasing Suitability Assessment. Each of the seven issues with its related planning criteria is discussed in Chapter 1 of the Draft.

Several problems brought up during the issue identification process are not included as separate issues in the RMP/EIS. Some of these are resolvable within continuing management guidance; others, such as the protection of significant cultural resources, would be resolved with the identification of Special Management Areas as proposed for Issue 1. Those aspects of current management that are not at issue are covered in the "Continuing Management Guidance" section of Chapter 2. The Continuing Management Guidance section is a summary of how the Rio Puerco Resource Area is presently being managed, and how, outside of the resolution of the issue questions, it will be managed when the RMP is approved. The Continuing Management Guidance was developed primarily from laws, regulations, and manuals, as well as from previous land use plans and grazing EIS's.

Four RMP alternatives were developed for the Draft that describe the different management options available to BLM for the RPRA. These alternatives were developed to respond to the issues and concerns expressed by the public and BLM early in the planning process. Each alternative presented a different blend and balance of resource allocations and uses. Together with the Continuing Management Guidance, each of the alternatives forms a separate, feasible land use plan.

This Proposed RMP/Final EIS provides BLM's responses to the comments received on the Draft RMP/EIS (41 letters, 2 petitions with 396 signatures, 9 form letters, and 4 hearings). The majority of the comments and all of the petitions and form letters were concerned with the ORV issue. Strong opinions were expressed both favoring motorized vehicle limitations and opposing motorized vehicle limitations. In the Cuba public hearing strong support for the limitations was expressed, and in Albuquerque both strong opposition to and support for ORV limitations was expressed. The attendance at the public hearings in Estancia and Grants was limited and no predominant opinions or comments were received.

Four other topics received most of the rest of the comments. Several comments were received expressing concern over the lack of detail in the RMP. There were several letters with detailed comments concerning the procedures and information used in resolving the vegetative use issue. The Special Management Areas (SMA's) were generally well received and supported. There were a few comments relating to the need for coal leasing. The other issues generally received limited comments.

Alternative D, the Balanced Management Alternative, was selected as the Proposed Plan; therefore it is discussed first in this summary. The impacts of implementing the Proposed Plan are described in Chapter 4 of this Proposed RMP/Final EIS. There were limited changes from the Draft RMP/EIS; the ORV sections were revised and expanded to provide a clearer explanation of the reasons for selecting the proposed ORV decisions. In addition, the Proposed Plan provides for an expanded off-road vehicle trail system, and provides for identification of an open ORV play area if requested. Other changes in the Draft included recommending the Pronoun Cave complex as an Area of Critical Environmental Concern (ACEC), and slightly revising the Continental Divide Trail corridor.

The Proposed Plan is designed to provide general management guidance. Specific projects for an area or resource will be detailed in activity plans with accompanying environmental analyses. These activity plans will discuss more precisely how a particular area or resource will be managed, and will comply with the approved RMP's resolution of the issues.

PROPOSED PLAN

Alternative D is the Balanced Management Alternative. This alternative was selected as the Proposed Plan. Its goal is to resolve the seven issues by providing for a combination of resource uses that would protect important environmental values and sensitive resources while at the same time allowing development of resources which provide commercial goods and services.

Twenty-two SMA's totalling 426,636 acres would be identified. This acreage includes private and State trust land that is being proposed for acquisition or proposed for management as part of the SMA's through agreements with owners. The twenty-two proposed SMA's include ten ACEC's, three Research Natural Areas (two of which would also be ACEC's), and one National Trail. The Ignacio Chavez SMA would be managed for a combination of uses including about 1,700 acres which would be open for fuelwood cutting, consistent with the principles of multiple use and sustained yield. In addition, limited greenwood cutting to reduce the invasion of pinyon and juniper into stands of ponderosa pine would be permitted in order to maintain the ponderosa pine stands and to improve wildlife habitat in the SMA. Rights-of-way granted through the area of overlap between the Ojito SMA and Ojito East rights-of-way window could have special stipulations attached to protect SMA values.

Four areas in the Azabache Station, Cabezon Peak, Guadalupe, and Ojito SMA's, two road segments in the Ignacio Chavez SMA, and two in the Ojito SMA, totalling 10,248 acres of public land and 10 miles of road, would be closed to motorized vehicle traffic. Two road segments in the Ojito SMA and three in the Ignacio Chavez SMA, totalling twelve miles, would be limited to authorized users. In addition to closures and limitations for SMA's, six miles of existing roads and trails would be closed outside of SMA's. Two areas would be designated for specific types of ORV use. One area would be used for trials motorcycle riding, both as a "play-area" and for competitive events. The other area would be designated for competitive dune-buggy events using existing routes. Other motorized vehicle travel in the RPRA would be designated as defined on Map 2-14. About 124 miles of existing roads and trails would be designated as an ORV recreation trail system. This system would be expanded as needed. More ORV trails would be identified in the RPRA, and a Resource Area-wide Transportation Plan will be developed to identify access needs.

The Proposed Plan would provide for a balance of resource uses through a program of improved grazing management. Future changes in management would be developed to resolve resource conflicts. It is estimated that short-term reductions in allowable livestock grazing use would be proposed for six allotments, with no reductions proposed for the remaining allotments. In the long term, livestock grazing use would return to currently allowable levels of use as resource conflicts are resolved as a result of improved grazing management and construction of rangeland improvements. The actual short- and long-term adjustments implemented would be based on current vegetative data and on vegetative monitoring studies.

About 58,000 acres of scattered and isolated tracts of public land within the land ownership adjustment issue area would be considered potentially available for ownership adjustment. Exchange of these public lands for State trust and private lands identified for acquisition as planned actions in SMA's or to benefit other resource management programs would be considered the preferred method of ownership adjustment. To expedite land ownership adjustments, exchanges for State trust lands would be processed as a first priority. Exchanges for private lands, a more time-consuming process, would be processed as a second priority. Recreation and Public Purposes Act disposals and public land sales would be considered as acceptable methods of ownership adjustment as third and fourth priorities. All public sale actions would be thoroughly examined under the NEPA process, including public participation. The planning criteria would be considered when analyzing public sale actions. As long as any future ownership adjustments conform to the theme of this alternative, such actions would be considered consistent with the RMP.

Fuelwood would be available to the public through commercial or home-use sales from approximately 9,320 acres of public land. Small additional amounts of fuelwood would also be made available to the public as a result of wildlife habitat improvement projects, right-of-way clearings, and as dead-and-down wood.

Rights-of-way corridors would be designated as the preferred locations for future transmission line placements in the RPRA (see Pocket Map B). In addition to the designation of right-of-way corridors, right-of-way windows would be established. Future rights-of-way would be located in Corridor I so as to minimize conflicts with coal resources. This would be accomplished by concentrating transmission lines in the southwestern part of the corridor adjacent to the area identified as acceptable for further consideration for coal leasing. However, any transmission lines located in an area leased for coal could be relocated at the lessee's expense to avoid bypass coal. The rights-of-way windows have been identified in areas where topographic or land ownership constraints make it advantageous to locate transmission lines on public land. Multiple use of the public lands within these windows would continue; however, discretionary developments which would complicate or increase the cost of right-of-way development would be prohibited. For example, fluid mineral leases issued within the windows would have stipulations attached to minimize conflicts with transmission lines.

Approximately 8,020 acres of public coal would be identified as acceptable for further consideration for coal leasing. The twenty unsuitability criteria (where the information was available) have been applied to the area of maximum coal development potential. The area of maximum coal development potential has also been scrutinized using the multiple use screens. Following surface owner consultation and the application of the unsuitability criteria and multiple use screens, only areas with no known conflicts were brought forward for further consideration.

The other three RMP alternatives are summarized below and further described in Chapter 2 in the Draft. The impacts anticipated from all of these alternatives are described in Chapter 4 in the Draft, and a comparative summary of impacts is included as Table 2-7 in the Draft.

The first alternative which was not selected represents a continuation of current management practices; for the purpose of the RMP/EIS, this constitutes the No Action Alternative. The second alternative stresses resource conservation, the third the production of commodity resources.

"No grazing" was initially proposed as an alternative for the vegetative uses issue. However, since this "No-Grazing Alternative" would not conform to the BLM requirement that alternatives be feasible, practical and implementable, it was eliminated from consideration. The impacts of implementing a No-Grazing Alternative on the public lands in the issue area are described in Appendix Q in the Draft.

The following description summarizes the key points of these other three alternatives:

ALTERNATIVE A

Alternative A is the continuation of current management and is referred to as the "No Action" Alternative. This alternative reflects the current management of the RPRA and how it would continue to be managed as described in the Continuing Management Guidance section of Chapter 2 in the Draft. This alternative provides a baseline for comparison of other alternatives.

No Special Management Areas (SMA's) would be identified.

No new ORV "closed" or "limited" designations would be implemented in the RPRA. All public land except those lands under Interim Wilderness Management and the Bluewater Canyon ACEC would remain open to motorized vehicle use.

No change in management would be proposed for the 123,300 acres of public land in the vegetative uses issue area. This alternative will be used to provide baseline data for the establishment of vegetative monitoring studies.

No adjustments in the land ownership pattern would take place under this alternative, unless public land were sold or exchanged as the result of future tract-specific amendments to the RMP.

The fuelwood supply issue area would continue to be open to collecting dead-and-down wood. About ten acres per year of greenwood would be made available for fuelwood cutting, primarily to reduce the encroachment of pinyon-juniper into ponderosa pine stands, and small amounts of fuelwood would be made available to the public as a result of wildlife habitat improvement projects, rights-of-way clearings, and as dead-and-down wood from areas chained or chemically treated to improve livestock forage.

No rights-of-way corridors or windows would be designated. New rights-of-way would continue to be processed on a case-by-case basis.

No new public coal leases could be granted in the RPRA.

ALTERNATIVE B

Alternative B is the Resource Conservation Alternative which places primary emphasis on maintaining or improving important environmental values. Commodity or non-renewable resource use would be permitted only to an extent compatible with this resource conservation emphasis. The goal of this alternative is to change present management direction so that the identified issues are resolved in a manner that places highest priority on the maintenance or improvement of environmental values.

Twenty-two Special Management Areas totalling 426,636 acres would be identified. This acreage includes private and State trust land proposed for acquisition, or proposed for inclusion in one of the SMA's by cooperative management. The proposed SMA's include nine ACEC's, three Research Natural Areas (one of which would also be an ACEC), and one National Trail. The Ignacio Chavez SMA would be open for woodcutting only to improve wildlife habitat. Rights-of-way granted through the area of overlap between the Ojito SMA and Ojito East rights-of-way window could have special stipulations attached to protect SMA values.

Four areas in the Azabache Station, Cabezon Peak, Guadalupe, and Ojito SMA's, two road segments in the Ignacio Chavez SMA, and two in the Ojito SMA, totalling 10,248 acres of public land and 10 miles of road would be closed to motorized vehicle travel. Two road segments in the Ojito SMA and three in the Ignacio Chavez SMA, totalling 12 miles, would be limited to authorized users. In addition to closures for SMA's, 6 miles of existing roads and trails would be closed outside of SMA's. Two areas would be designated for specific types of ORV use. One area would be used for trials motorcycle riding, both as a "play-area" and for competitive events. The other area would be designated for competitive dune-buggy events using existing roads. Other motorized vehicle travel in the RPRA would be limited to existing roads and trails. About 124 miles of existing routes would be designated as an ORV recreation trail system.

This alternative would provide for improved ecological condition, enhanced wildlife habitat, and improved protection of watershed resources through reductions in allowable livestock grazing use and improved grazing management. It is estimated that reduction in allowable livestock grazing use would be proposed for nine Improve Category ("I") allotments, while no reduction would be anticipated for the Maintain ("M") and Custodial ("C") allotments. The actual reductions would be based on currently available vegetative data and on vegetative monitoring studies. Requests for increases in allowable livestock grazing use would be considered when wildlife and watershed needs are satisfied.

Approximately 58,000 acres of scattered and isolated tracts of public land within the land ownership adjustment issue area are considered potentially available for land ownership adjustment. Exchange of these public lands for State trust and private lands identified for acquisition as planned actions in SMA's or to benefit other resource management programs would be considered the preferred method of ownership adjustment. To expedite land ownership adjustments, exchanges for State trust lands would be processed as a first priority. Exchanges for private lands, a more time-consuming process, would be processed as the second priority. All other public land within the issue area would be retained as public lands for the enhancement of BLM resource management programs.

Fuelwood would be available to the public through commercial or home-use sales from approximately 7,620 acres of public land. Small additional amounts of fuelwood would also be made available to the public as a result of wildlife habitat improvement projects and right-of-way clearings, and as dead-and-down wood.

Rights-of-way corridors and windows would be designated as the preferred locations for future transmission line placements in the RPRA. The area of maximum coal development potential underlying the proposed corridor in the San Luis area would not be available for coal leasing. No fluid mineral leasing would be allowed in the rights-of-way windows in order to provide protection for these critical transmission line placement areas.

About 6,400 acres of public coal resources would be identified as acceptable for further consideration for coal leasing. The twenty unsuitability criteria (where the information was available) have been applied to the area of maximum coal development potential. The area of maximum coal development potential has also been scrutinized using the multiple use screens. Following surface owner consultation and application of the unsuitability criteria and multiple use screens only areas with no conflicts were brought forward for further consideration.

ALTERNATIVE C

Alternative C is the Resource Production Alternative. This alternative would place primary emphasis on making public land and resources available for use and development. The principles of multiple use and sustained yield would be observed, and environmental values protected to the extent required by applicable laws, regulations, and policies. The goal of this alternative is to change management direction in the RPRA so that the seven issues are resolved in a manner that generally places highest priority on the production of resources from the public lands.

Only the sixteen SMA's which would not significantly restrict development of commodity resources (fuelwood and minerals) would be identified. The SMA's considered in this alternative total 366,375 acres. The Ignacio Chavez Grant would be open for intensive fuelwood management to help meet expressed fuelwood demand and would not be managed as an SMA. Rights-of-way granted through the area of overlap between the Ojito SMA and Ojito East rights-of-way window could have special stipulations attached to protect SMA values.

Four areas in the Azabache Station, Cabezon Peak, Guadalupe, and Ojito SMA's and two road segments in the Ojito SMA would be closed to motorized vehicle travel. These closures total 10,248 acres. The rest of the RPRA, except for the the public lands under Interim Wilderness Management or in the Bluewater ACEC, would be designated as "open" for motorized vehicle use.

This alternative would provide for the maximization of forage production for livestock grazing use through an intensive program of grazing management. It is estimated that short-term reductions in allowable livestock grazing use would be proposed on six "I" allotments, with long-term increases in allowable livestock grazing use anticipated on these six allotments, as well as six other "I" and "M" allotments. The determination of AUM's required for short-term reductions and

AUM's available for increased livestock grazing use in the long term would be based on currently available vegetative data and on vegetative monitoring studies. Changes in grazing management would be implemented only to increase forage production and improve ecological condition. Increased forage for wildlife habitat and watershed protection would be considered only after livestock grazing use needs were met.

Approximately 58,000 acres of scattered and isolated tracts of public land are considered potentially available for disposal. Under this alternative, the preferred method of disposal of the public lands identified as potentially available for disposal would be public auction. As long as any future ownership adjustments conform to the theme of this alternative, such actions would be considered consistent with the RMP. All public sale actions would be thoroughly examined under the NEPA process, including full public participation. The planning criteria for this issue would also be considered when analyzing public sale actions.

Fuelwood would be made available to the public through commercial or home use sales from approximately 29,930 acres of public land. Small additional amounts of fuelwood would also be made available to the public as a result of wildlife habitat improvement projects, right-of-way clearings, and as dead-and-down wood.

Rights-of-way windows would be established on the public lands. These rights-of-way windows have been identified in areas where topographic or land ownership constraints make it advantageous to locate transmission lines on public land. Multiple use of the public lands within these windows would continue; however, discretionary land uses which would complicate or increase the cost of right-of-way development would be prohibited. Rights-of-way granted through the area acceptable for further consideration for coal leasing would be restricted to placement in the *de facto* corridor. Fluid mineral leases issued within the windows would have stipulations attached to minimize conflicts.

Approximately 8,020 acres of public coal resources would be identified as acceptable for further consideration for coal leasing. The twenty unsuitability criteria (where the information was available) have been applied to the area of maximum development potential and lands found unsuitable have been eliminated from further consideration. Application of the multiple use screens would not eliminate any lands from further consideration under this alternative, nor would surface owner consultation.

Chapter 1

INTRODUCTION, ISSUES AND CRITERIA

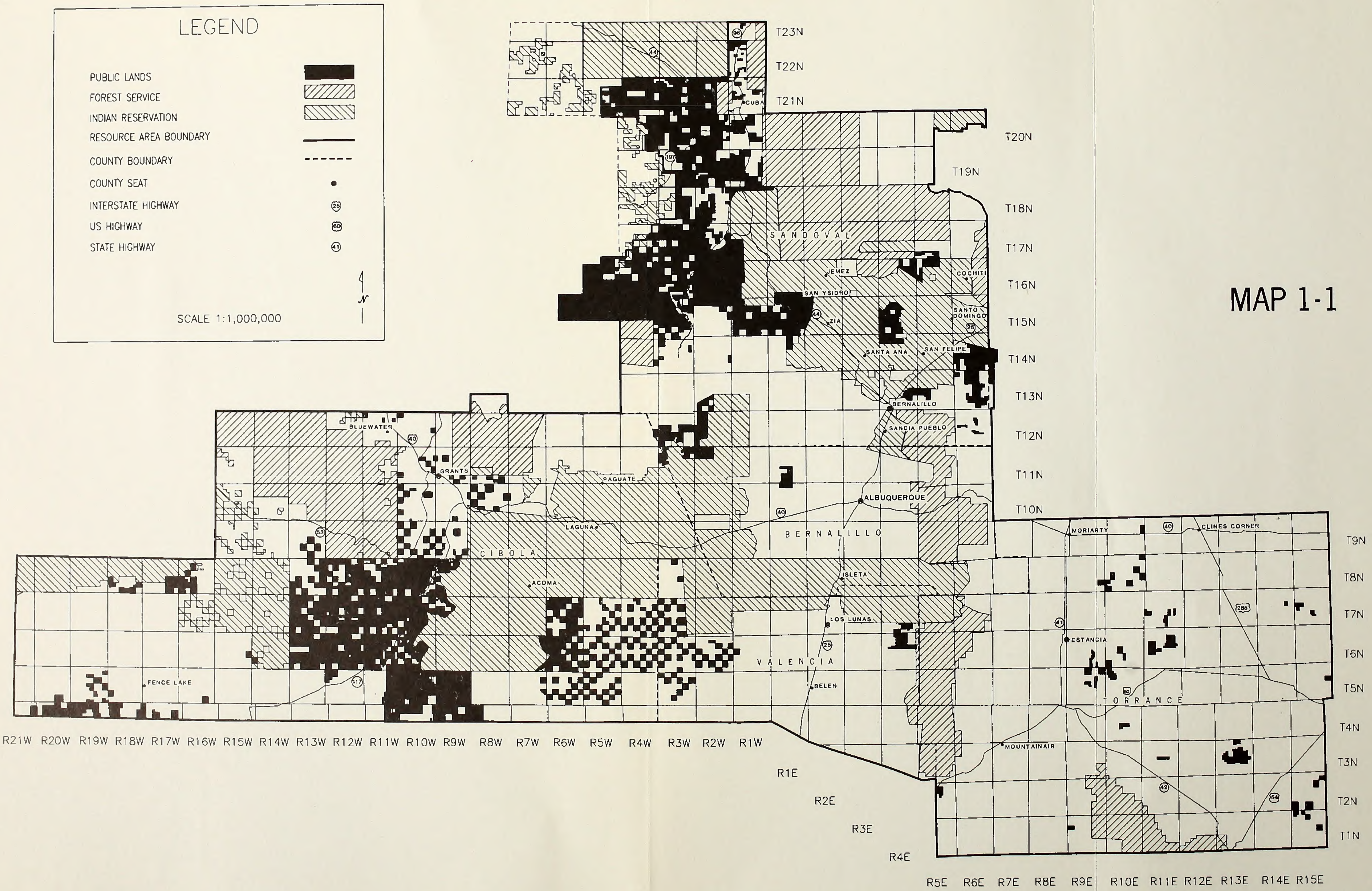
CHAPTER 1

PURPOSE AND NEED

ADDITIONS AND CORRECTIONS

For clarity, Map 1-1 has been revised and reprinted at a larger scale (1:1,000,000). Since publication of the Draft RMP/EIS, the "Navajo Exchange" has been consummated. Through this exchange, the BLM has acquired the majority of the privately-owned surface in El Malpais Wilderness Instant Study Area. Map 1-1 has also been revised to reflect this change in land status.

RIO PUERCO PLANNING AREA



MAP 1-1

Chapter 2

PROPOSED
RESOURCE MANAGEMENT PLAN

CHAPTER 2

PROPOSED RESOURCE MANAGEMENT PLAN

INTRODUCTION

This Chapter presents the Proposed Plan and is divided into two major sections: (1) Description of the Proposed Plan and (2) Continuing Management Guidance. The description of the Proposed Plan outlines new management policy the BLM would implement. The continuing management guidance is the Rio Puerco's existing management program which would continue without change under the Proposed Plan.

HOW THE PLAN WAS SELECTED

The Proposed Plan was selected by a team composed of the District Manager, Area Manager, RMP Team Leader, and appropriate RMP Team specialists, and reviewed by the State Director. It was selected based on (1) issues raised throughout the planning process; (2) public input received during the formal ninety-day comment period on the Draft, at meetings, and in response to various mailings; and (3) the environmental analysis developed on the previously-formulated alternatives.

DESCRIPTION OF THE PROPOSED PLAN

This section describes for each issue the management theme, the proposed management actions, the rationale for those actions, and the description of the procedures needed for implementation.

This section uses the same table and map numbers as the Draft. The comments and responses section in Chapter 5 references some corrections in tables and maps; to avoid confusion in reprinting these maps and tables, the numbers in the Draft have not been changed. Maps and tables are referenced "in the Draft" if they have not been reprinted.

The Proposed Plan is a modified version of the Preferred Alternative (Alternative D) presented in the Draft. To aid in comparing the Proposed Plan with Alternative D in the Draft, all substantive changes are in bold face.

PROPOSED PLAN

Theme

The Proposed Plan for this RMP/EIS is designed to provide balanced management direction for the RPRA. Its goal is to resolve the seven issues by providing for a combination of resource uses that would protect important environmental values and sensitive resources while at the same time allowing development of resources which provide commercial goods and services.

1. Special Management Areas

Twenty-two SMA's totaling 426,636 acres would be identified under this alternative (see Table 2-3 in the Draft, Table 2-4, and Appendix C). This acreage includes private and State trust land that is being proposed in this alternative for acquisition or proposed for management as part of the SMA's through cooperative management with the owner. The twenty-two proposed SMA's include **ten** ACEC's, three Research Natural Areas (**two** of which would also be ACEC's), and one National Trail (see Appendix C). Parts of the proposed El Malpais SMA have already been designated as an Outstanding Natural Area, a Natural Environmental Area, and a National Natural Landmark. The Ignacio Chavez SMA would be managed for a combination of uses. **About 1700 acres in the area between the current Ignacio Chavez and Chamisa Wilderness Study Areas (see Map 2-10 in the Draft) would be open for fuelwood management, consistent with the principles of multiple use and sustained yield. Limited greenwood cutting to reduce the invasion of pinyon and juniper into stands of ponderosa pine would be permitted in order to maintain the ponderosa pine stands and to improve wildlife habitat on 17,300 acres of the SMA.** A portion of the Ojito East rights-of-way window overlaps the Ojito SMA (see Map C-16). Special stipulations could be attached to any right-of-way granted in this area of overlap to provide protection for the SMA's resource values. **It has not been possible to identify all potential SMA's. Other areas may be identified in the future as SMA's if they are consistent with the planning criteria (see Chapter 1 in the Draft) and with the goals of the approved Resource Management Plan.**

Reasoning

This plan would provide special management consideration for areas with important recreational, natural, scientific, cultural, and scenic values. These areas

require more management attention than existing management programs provide. The special resource features of these areas would be significantly enhanced by specifically managing these resources. This part of the plan provides for special management consideration for resources not covered by a specific issue.

No significant resource conflicts were identified in any of the Special Management Areas. The management objectives of these areas are generally consistent with multiple resource management.

Implementation

An activity plan and environmental analysis describing the management prescriptions, facilities, monitoring, and enforcement requirements will be prepared for each SMA. The BLM will prioritize the SMA's and prepare activity plans over a period of several years. Funding for monitoring, enforcement, and construction of improvements would be requested in the budget process. The improvements will be constructed as funds are allocated.

TABLE 2-4

SPECIAL MANAGEMENT AREAS

Proposed Plan
Torrejon Fossil Fauna
Pelon Watershed
Historic Homesteads
Canon Jarido
Jones Canyon
Headcut Prehistoric Community
San Luis Mesa Raptor Area
Azabache Station
Cabezon Peak
Ignacio Chavez
Big Bead Mesa
Canon Tapia
Guadalupe Ruin and Community
Elk Springs
Tent Rocks
Ojito
Ball Ranch
Pronoun Cave Complex
Continental Divide Trail
1870's Wagon Road Trail
El Malpais
Petaca Pinta

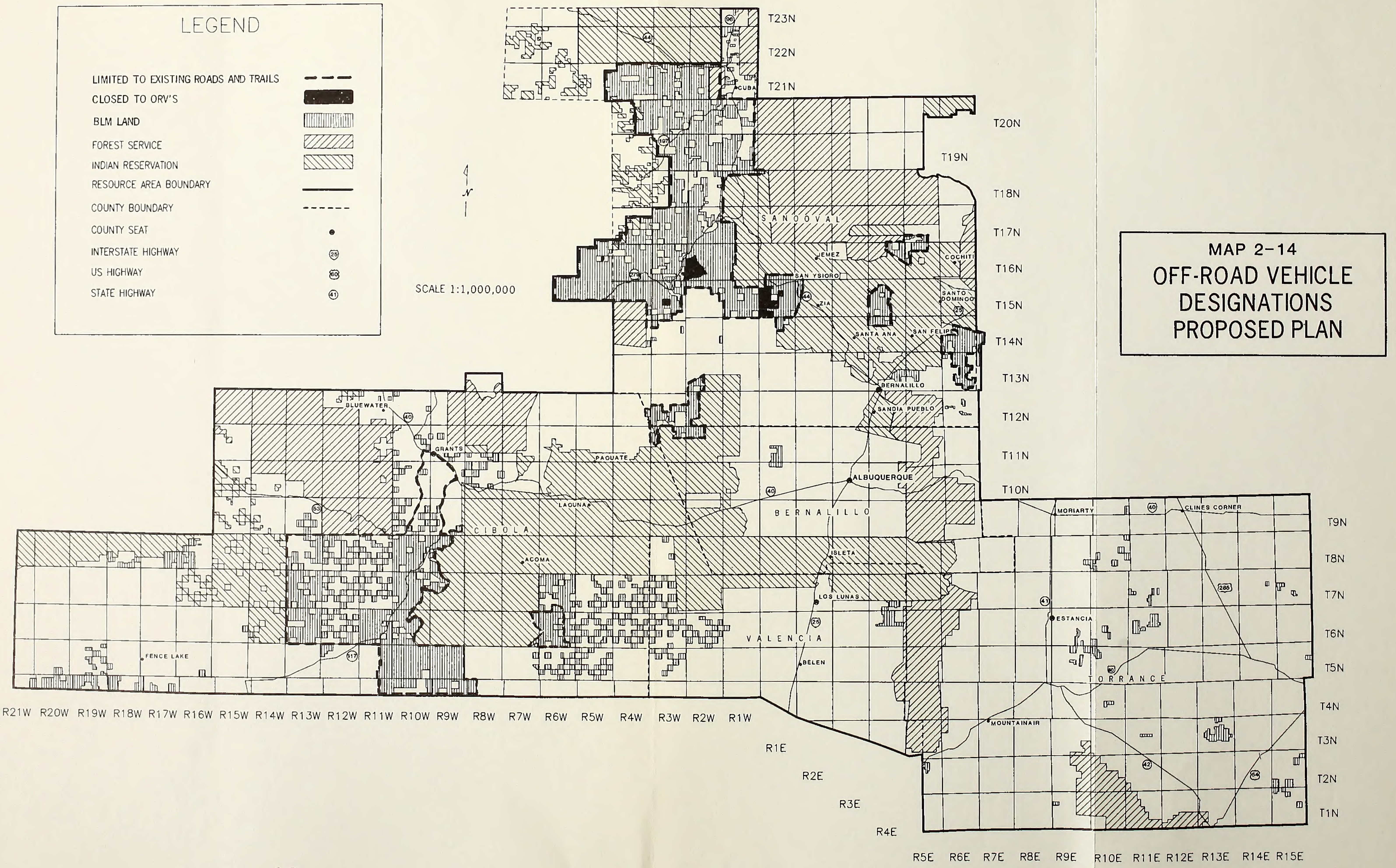
2. Off-Road Vehicle Designation

Under this alternative four areas in the Azabache Station, Cabezon Peak, Guadalupe, and Ojito SMA's, two road segments in the Ignacio Chavez SMA, and two road segment in the Ojito SMA, totalling 10,248 acres of public land and 10 miles of road, would be closed to motorized vehicle traffic as planned actions for the SMA's. Two road segments in the Ojito SMA and three in the Ignacio Chavez SMA, totalling twelve miles, would be limited to authorized users (see Maps C-8, C-9, C-10, C-13, and C-16). In addition to closures and limitations for SMA's, six miles of existing roads and trails in three road segments would be closed outside of SMA's (see Map 2-7 in the Draft). The existing Bluewater ACEC would remain closed to motorized vehicle traffic. Vehicular use within Wilderness Study Areas (see Map 2-6 in the Draft) would continue to be limited to existing roads and trails. If Congress designates these areas as "Wilderness," they would be closed to all motorized vehicle use. Use of two road segments would be limited to authorized users. One area would be used for trials motorcycle riding, both as a "play-area" and for competitive events (Map 2-8 in the Draft). The other area would be designated for competitive dune-buggy events using existing routes (Map 2-9). The BLM will attempt to acquire access to this area; there are approximately two miles of private land which must be crossed in order to obtain access to the area. The BLM would work with local user groups to identify an open ORV play area if requested by these groups. Other motorized vehicle travel in the RPRA would be limited to the existing roads and trails areas defined on Map 2-14. The roads and trails in these areas have been delineated; this information is available in the Management Situation Analysis (MSA). About 124 miles of existing roads and trails would be designated as an ORV recreation trail system (see Pocket Map E in the Draft). This system will be expanded in the future. Competitive event courses for motorcycle use will be identified in the RPRA with input from local user groups.

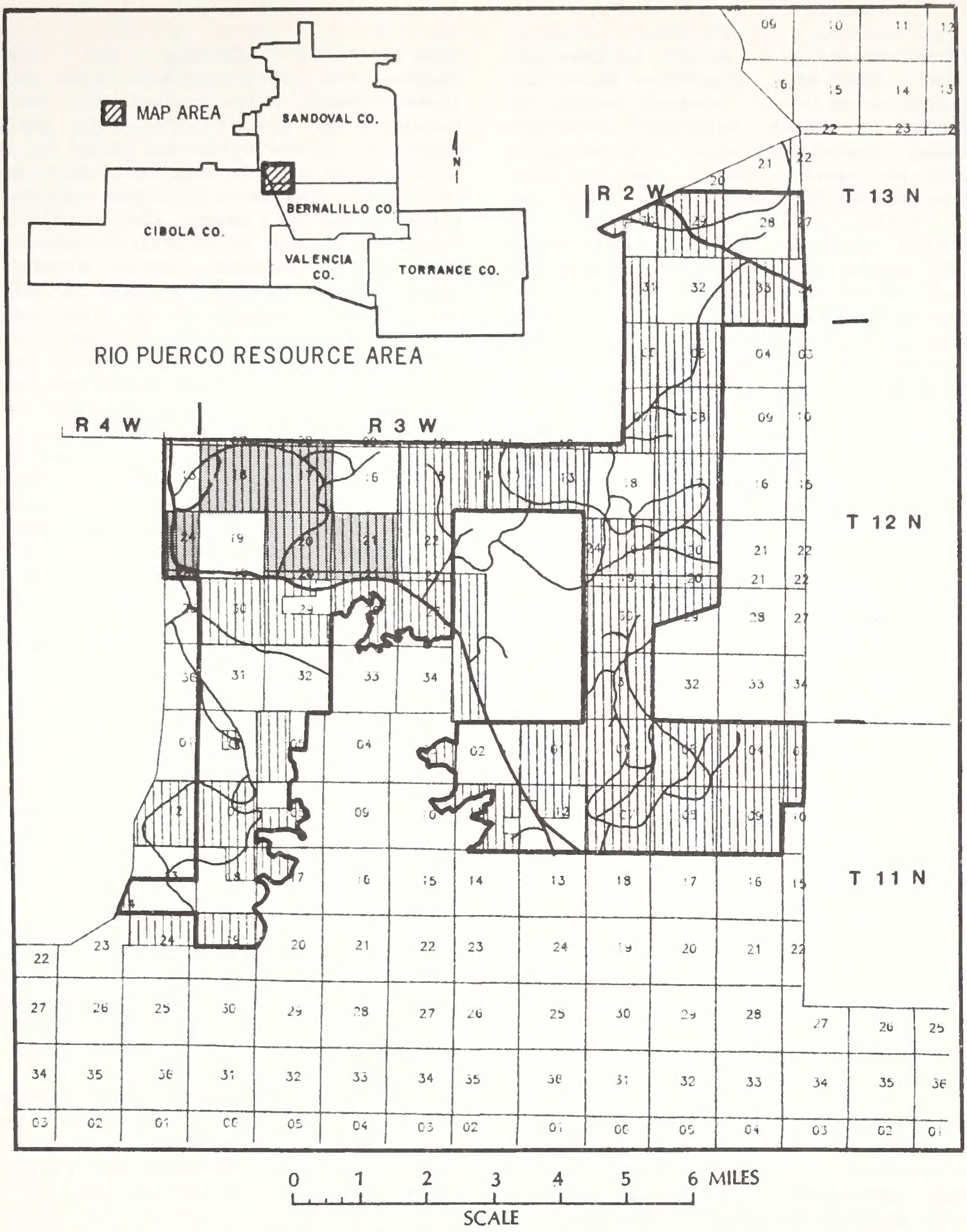
Reasoning

This was the most controversial issue; there were strong opinions voiced both for and against "open" motorized vehicle use designation. The Rio Puerco watershed is nationally recognized as being a highly erosive area. Most of the watershed is

RIO PUERCO RESOURCE AREA



MAP 2-14
OFF-ROAD VEHICLE
DESIGNATIONS
PROPOSED PLAN



MAP 2–9
COMPETITIVE DUNE BUGGY EVENT AREA

SURFACE OWNERSHIP

BLM	▥
PRIVATE	☐

COMPETITIVE DUNE BUGGY EVENT STUDY AREA	━
PROPOSED COMPETITIVE DUNE BUGGY EVENT AREA	▨
GRADED ROAD	—
PRIMITIVE TRAIL	—

classified as being in severe to critical condition. Therefore, activities which are likely to accellerate erosion would be detrimental to overall watershed condition and cause increased impacts downstream. Limiting motorized vehicle use in the majority of the RPRA to existing roads and trails would reduce the pattern of accelerated erosion in the watershed. There is little doubt that the demand for off-road motorized vehicle travel is growing and the sale of all-terrain vehicles and dirt bikes is increasing approximately 51 percent a year. The RPRA surrounds Albuquerque, which is increasing in population two percent a year and is the largest metropolitan area in the State. Motorized vehicle use is a legitimate use of the public lands, but it must be consistent with other uses.

Under the proposed "limited" status, a majority of the ORV experiences can be provided for. The Rio Puerco has over 1500 miles of roads and trails already inventoried, many of them extremely primitive, which can provide for most ORV recreational experiences. A challenging ORV trail system is proposed and can be expanded in the future. Competitive ORV events have been provided for in the past and will continue to be provided for under this Proposed Plan.

It is important to note that the ORV designations should not be interpreted to include only recreational uses of public lands. These designations cover all motorized vehicle use of the public land for any purpose. This plan provides adequate recreational access to the public lands. In addition, the BLM will be actively identifying other areas for which vehicle access needs to be acquired.

Because ORV use on BLM lar is dispersed, it is difficult to enforce limitations. Most other uses of the public lands require a permit or lease which makes it much easier to control the impacts and use. The dispersed nature of ORV use makes it difficult to control impacts before serious degradation occurs. The extremely fragile soils and poor vegetative cover of the Rio Puerco watershed make it difficult and expensive to control the erosion problem. The cost of reclaiming an area would be the responsibility of the BLM because there would be no bond or lease stipulations that could be relied upon.

Closing four roads would create minimum conflicts with other resources, and would enhance more primitive recreational opportunities. Closing the Azabache Station SMA and Guadalupe Ruin to ORV travel would help protect the cultural resources of these SMA's. The Querencia Watershed in the Ojito SMA would be closed to motorized vehicle use to protect ongoing watershed studies. The Las Milpas gas pipeline and well areas, also in Ojito SMA, would be closed to motorized vehicle use for safety considerations. Closing the Cabezon Peak SMA to motorized vehicle use would protect this area's rare plants, scenic values, cultural resource values, and raptor nesting sites. Most of the Cabezon Peak SMA is presently inaccessible to motorized vehicle use because of the very steep, rocky terrain.

The areas in Torrance, Cibola, and Valencia counties that are open to motorized vehicle use are scattered or checkerboard lands for which legal access is difficult; the land ownership in these areas tends to limit motorized vehicle use.

Implementation

As required by the ORV regulations, the BLM will publish the ORV designations for public lands in the Federal Register and local newspapers. The BLM will then complete a program of signing to inform the public of the ORV designations. A detailed monitoring and enforcement program will be developed with appropriate environmental analysis with extra emphasis on the Special Management Areas. A detailed activity plan and environmental analysis will be developed with input from user groups for recreational ORV trails and a complete Transportation Plan will be prepared for the RPRA. As other ORV trail systems are developed, additional activity plans will be prepared in consultation with user groups. If requested by user groups, an "open" ORV play area may be identified and an activity plan prepared. Activity plans will be prepared on each ORV competitive event area.

3. Vegetative Uses

This Plan would provide for a balance of resource uses through a program of improved grazing management. Future changes in management would be developed in cooperation with all Resource Area specialists to resolve the resource conflicts identified in Appendix M in the Draft. It is estimated that short-term reductions would be proposed for six allotments, with no reductions proposed for the remaining allotments. In the long term, livestock grazing use would return to currently allowable levels of use as resource conflicts are resolved as a result of improved grazing management. Estimates of the short- and long-term adjustments in allowable livestock grazing use to be proposed under this alternative are displayed on Table 2-1. The actual short- and long-term adjustments implemented would be based on current vegetative data and on a five-year program of vegetative monitoring studies. Appendix P in the Draft displays estimated short- and long-term AUM's by alternative for the "M" and "I" allotments.

Reasoning

All grazing allotments in the issue area were placed into one of three selective management categories. The purpose of this categorization process is to focus management on those allotments where changes could produce cost-effective improvement in resource conditions. The "M" (Maintain) category allotments are already in acceptable ecological condition and have no significant resource conflicts. The "C" (Custodial) allotments have no significant resource conflicts nor potential for cost-effective improvement in ecological condition. The "I" (Improve) allotments are in unacceptable ecological condition and/or have significant resource conflicts.

This Plan provides for implementation of management and/or reductions in allowable livestock grazing use on the "I" category allotments that would ensure improvement in ecological condition to acceptable levels, the provision of forage needs for livestock grazing use and wildlife habitat, and improvement in watershed conditions.

In addition, selective management categories will be changed in the future as ecological conditions improve and resource conflicts are resolved for the "I" allotments. Selective management categories also can be changed for the "M" allotments if resource conflicts are identified, and for the "C" allotments if technical advances would allow for cost-effective change in resource conditions. Any "M" or "C" allotments which are converted to the "I" category will be managed in accordance with the objectives of the approved RMP.

Implementation

Implementation will be conducted in accordance with Section 8 of the 1978 Public Rangelands Improvement Act which requires consultation, coordination, and cooperation with all affected and interested parties. The "M" and "C" category allottees will be notified by letter of their selective management category and the implications of this categorization within nine months of publication of the Proposed RMP/Final EIS.

All "I" category allottees will be issued grazing decisions within seventeen months of the publication of the Proposed RMP/Final EIS. These grazing decisions will specify the allotment objectives, initial stocking levels and management changes agreed upon in consultation, the type of monitoring studies to be conducted, and how inventory and monitoring data will be used to adjust stocking levels.

Monitoring studies will be conducted during the four growing seasons following the issuance of the initial decision. These annual studies will consist of trend utilization, actual use, and precipitation data. During the fifth year, the collected data will be evaluated, consultation with the affected allottees and interested parties will be conducted, and, based on these evaluations and consultations, decisions will be issued specifying the allotment objectives, stocking rates, and any management changes, including Allotment Management Plans (AMP's), which would be implemented.

AMP development will begin in consultation with all affected and interested parties, including allottees and Resource Area specialists, when sufficient information is available to determine the type of grazing system and range improvements needed for each allotment. The effectiveness of management changes implemented by these AMP's will be monitored by continued collection of vegetative condition and trend data.

Progress of implementation can be tracked through the Rangeland Management Program Document Update which is published annually by the RPRA.

4. Land Ownership Adjustments

About 58,000 acres of public land identified on Table 2-6 are scattered and isolated tracts within the issue area considered potentially available for ownership adjustment. Under this alternative, exchange of these public lands for State trust and private lands identified for acquisition as planned actions in SMA's or to benefit other

TABLE 2-1

SUMMARY OF ESTIMATED CHANGES IN AUM'S BY ALTERNATIVE

	Alternative A No Action	Alternative B Resource Conservation	Alternative C Resource Production	Alternative D Balanced Management
Short-Term AUM's	18,639	16,745	17,941	17,789
Net Change from Current Use	0	-1,894	-698	-850
Allotments Receiving Adjustments	0	9	6	6
Long-Term AUM's	18,639	16,745	20,289	18,634
Net Change from Current Use	0	-1,894	+1,650	+850
Allotments Receiving Adjustments	0	9	12	6

resource management programs would be considered the preferred method of ownership adjustment. To expedite land ownership adjustments, exchanges for State trust lands would be processed as a first priority. Exchanges for private lands, a more time-consuming process, would be processed as a second priority.

All public lands (surface and/or subsurface estate) not identified for disposal would be retained in Federal ownership, unless exchanged to consolidate Federal lands (e.g., a BLM/State of New Mexico exchange to block up BLM-administered land and to block up State land within a specific county). A specific example of this type of exchange would be the checkerboard lands in Cibola and Valencia counties located in T. 5 N., 6 N., and 7 N.; R. 2 W., 3 W., 4 W., 5 W., and 6 W. which would be available for exchange to consolidate the Federal ownership of these lands.

It has not been feasible to identify in this RMP/EIS all of the State and private lands whose acquisition would benefit BLM resource management programs. As they are identified in the future, their acquisition would be examined through the NEPA process, including full public involvement.

Adjustment of land ownership patterns by exchange is such a slow, expensive, and labor intensive process that it is difficult for the BLM, the State of New Mexico, and private landowners to keep appraisals current. Under this alternative, Recreation and Public Purposes Act disposals and public land sales would be considered as acceptable methods of ownership adjustment as third and fourth priorities. All public sale actions would be thoroughly examined under the NEPA process, including public participation. The planning criteria (see Chapter 1) would be considered when analyzing public sale actions.

Direct transfer of land in Torrance County to the National Park Service or other such agency would be considered if the transfer would provide for the protection of cultural and paleontological resources of National, State, regional, or local significance, the protection of valuable wildlife habitat, and the protection of other natural resource values.

As long as any future ownership adjustments conform to the theme of this alternative, such actions would be considered consistent with the RMP.

Reasoning

The Proposed Plan will provide more effective management of the public lands through an active disposal and acquisition program. Small scattered parcels which are difficult to manage can be used for exchanges to block up more valuable public land tracts. This would help concentrate BLM funds and personnel into a more compact land area which would improve management efficiency. Many of the scattered tracts have limited economic value. Therefore, selling lands which cannot be used for exchange will lower management costs and bring in revenues.

The lands identified for exchange do not have known significant resources, nor would they contribute to management of significant resources.

Implementation

The first priority for land ownership adjustment would be to exchange land with State and Federal agencies, with exchange with private parties as second priority. The BLM would first complete exchanges to block up Special Management Areas. Exchanges to consolidate other BLM areas would be processed next. The BLM would develop an "action plan" for the lands identified for disposal.

After an exchange is initiated with an interested party, the BLM must determine if the exchange is in the public interest. If this were found to be the case, a land report and environmental assessment would then be prepared including detailed inventories of the land for cultural resources, and threatened, endangered, or rare species. An appraisal of the land would be completed to ensure that the economic value of the lands are equal and a cadastral survey of the parcels would be completed if necessary. The conveyance documents would be prepared, including any patent reservations to protect valid existing rights such as rights-of-way. Grazing allottees would be given a two-year notice of cancellation of their grazing permits. After a final exchange agreement is reached, the titles to the land would be exchanged.

If the land is sold, the same steps would be followed except that land surrounded by holdings of a single landowner would be sold directly to that landowner at fair market value. If there are two or more interested parties, the land would be offered competitively, using sealed bids. Only bids of at least fair market value would be considered to be acceptable.

Exchanges and land sales are slow, complex processes. Land ownership adjustments should be considered a long-term program.

5. Fuelwood Supply

Fuelwood would be available to the public through commercial or home-use sales from approximately 9,320 acres of public land under this alternative (see Map 2-10). Small additional amounts of fuelwood would also be made available to the public as a result of wildlife habitat improvement projects, right-of-way clearings, and as dead-and-down wood.

Reasoning

The RPRA surrounds Albuquerque, New Mexico's major population center, and therefore receives an increasing demand for fuelwood. Rural residents are dependent on public lands to provide fuelwood as their traditional heating and cooking fuel. Based on inventories of woodlands in the RPRA, fuelwood cutting can occur on a sustained yield basis to help meet some of the demand for fuelwood.

Designation of fuelwood cutting areas would be consistent with other resource values, and could be used to improve wildlife habitat. Providing more fuelwood cutting areas could help to reduce the amount of trespass woodcutting. Cutting pinyon and juniper would also help maintain ponderosa pine stands. This type of woodland management would allow a reasonable harvest of firewood while protecting or enhancing other resource values.

Implementation

The fuelwood cutting areas will be inventoried and sampled to help determine the allowable cut. After these areas are inventoried, a detailed activity plan and environmental analysis will be completed which implements a permit system, appropriate fees, allowable cut, clean-up enforcement, and a monitoring plan. The public will then be notified in the local news media of the fuelwood cutting areas and requirements.

6. Rights-of-Way Corridors

Rights-of-way corridors and windows (Pocket Map B) would be designated as the preferred locations for future transmission line placements in the RPRA. The rights-of-way windows have been identified in areas where topographic or land ownership constraints make it advantageous to locate transmission lines on public land. For the most part, they lie within the rights-of-way corridors identified on Pocket Map B. Multiple use of the public lands within these windows would continue; however, discretionary developments which would complicate or increase the cost of right-of-way development would be prohibited. Future rights-of-way developments would be situated to minimize conflicts with coal resources. This would be accomplished by requiring the placement of future transmission lines in the southwestern portion of the corridor, and by placing them as close to each other as safety and technology allow. The coal leasing area would therefore be avoided until this portion of the corridor is saturated with transmission lines. Also, coal leases issued within the rights-of-way corridor would have special stipulations attached which would make the lessee financially responsible for the relocation of any right-of-way that would create bypass coal. In addition, special stipulations would be attached to any fluid mineral leases in the windows to minimize conflicts in these critical placement areas.

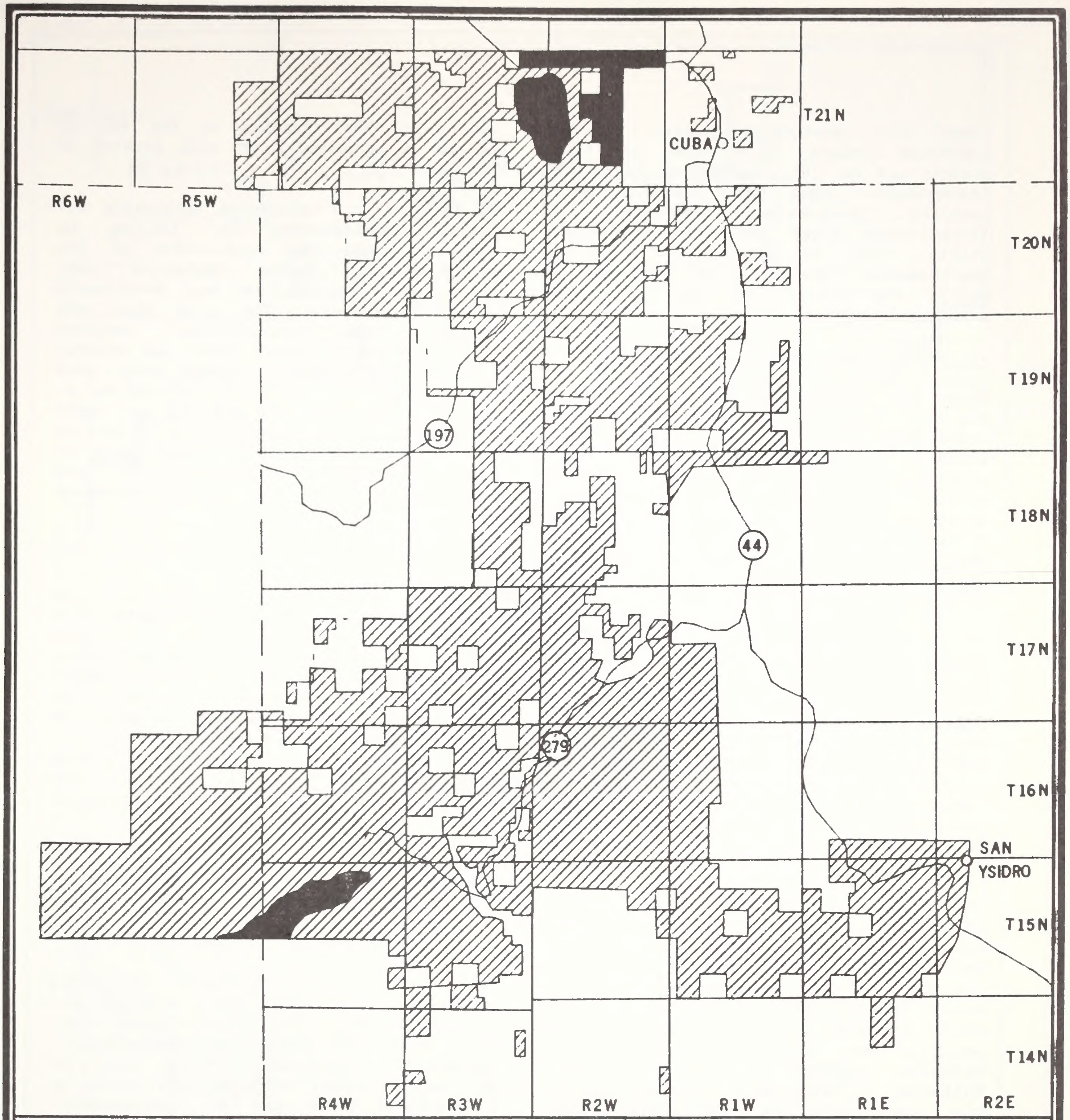
Reasoning

The RPRA lies between New Mexico's major population center and the State's major power generation and natural gas production area. Consolidation of rights-of-way will help limit the impacts to other resources and landowners. Placing a right-of-way corridor north of Placitas will help to eliminate conflicts with private landowners in the Las Huertas Valley. The corridors chosen are along existing transmission lines and generally avoid sensitive areas. Special stipulations will be attached to rights-of-way in the Ojito area to protect the resource values in this SMA.

Consolidating rights-of-way will also assist utility companies by providing an area in which transmission line placement is the primary use. Limitations would be placed in rights-of-way windows on activities which are not consistent with transmission line placement.

Implementation

The implementation of this program will be based on applications for rights-of-way. The BLM will then ensure that transmission



MAP 2-10
FUELWOOD SUPPLY - PROPOSED PLAN

▨ PUBLIC LAND

■ WOODCUTTING AREA

lines are constructed within existing corridors unless there are compelling reasons not to. Construction of additional transmission lines will require site-specific environmental analysis. If transmission lines are not constructed within the existing corridors the environmental analysis must discuss in detail the reasons for not using the existing corridors.

7. Coal Leasing Suitability Assessment

Under the Proposed Plan, the majority of the coal resources in the area of maximum development potential, about 8,020 acres, would be considered acceptable for further consideration for leasing. In the area of maximum coal development potential, new rights-of-way would be located so as to minimize impacts to the coal resources. Only the coal underlying the established *de facto* corridor would be considered unacceptable (see Map 2-11 in the Draft).

The Chico Wash South tract, a coal tract in the San Juan River Coal Region, was carried forward in the Draft RMP/EIS as an existing decision in Appendix A (Chaco MFP M-1.1). However, it has now been recommended in the Final San Juan River Coal EIS to be dropped from consideration during this round of coal leasing unless additional drilling information is obtained and an adequate cultural resources inventory is completed. The Chaco M-1.1 decision has been amended in Appendix A.

The twenty unsuitability criteria (where the information was available) have been applied to the area of maximum coal development potential (see Appendix E in the Draft). The area of maximum coal development potential (Appendix D in the Draft) has also been scrutinized using the multiple use screens (see Issues and Criteria, Chapter 1 in the Draft). Following surface owner consultation and the application of the unsuitability criteria and multiple use screens (Appendix E in the Draft), only areas with no known conflicts were brought forward for further consideration under this alternative. This acreage would be inventoried for cultural resources during activity planning.

Reasoning

Bringing lands forward for further consideration for coal leasing would allow the RPRA to consider coal leasing if the need arises within the next twenty years. This issue was included in the RMP to provide an opportunity for coal leasing in the long term.

The area that is considered acceptable for further consideration for leasing is consistent with the application of the unsuitability criteria, multiple use, surface owner consent, and coal development potential screens. The area that was dropped from consideration contains existing rights-of-way. There are several critical rights-of-way within this area which would be extremely expensive to relocate; therefore the BLM did not apply any exceptions to Unsuitability Criterion 2. In order to maximize development of coal resources, construction of new rights-of-way would occur in the southwest edge of the corridor first.

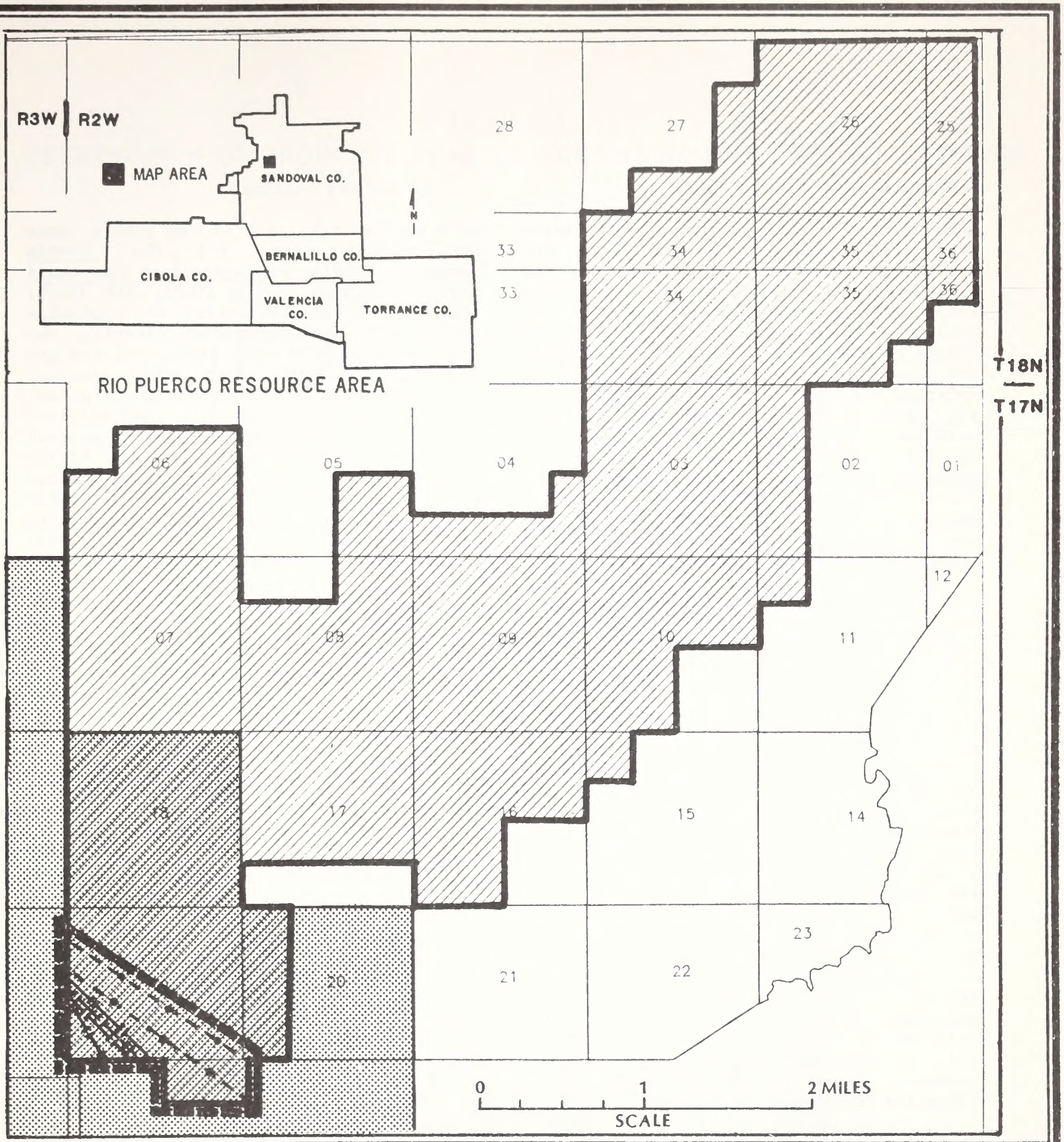
Implementation

After an area has been identified as acceptable for further consideration for leasing, it is included in a complex activity planning process which delineates the actual coal tracts. An environmental impact statement is prepared assessing the coal tracts for leasing, and a group of coal tracts is selected for lease sale. After tracts are leased but before mining occurs, a mine plan is prepared and another, more detailed environmental analysis is completed.

The coal area found acceptable for further consideration for leasing in this RMP would not be considered in a regional EIS for leasing until the San Juan River coal region tracts have been leased.

While not currently approved, but under consideration for the San Juan Basin, another method of coal leasing is to offer coal tracts by application. Briefly, leasing by application occurs when an interested company makes an application on a specific tract and an environmental analysis is prepared on that tract; the tract is then offered competitively. A mine plan and environmental analysis must be prepared before the tract is mined. The San Juan River coal region would have to be eliminated as a region before leasing by application could occur.

Coal leasing in the RPRA should be considered a long-term program. Coal leasing in the RPRA is unlikely within the next few years.



MAP 2-11
COAL LEASING SUITABILITY ASSESSMENT PROPOSED PLAN

ELECTRICAL TRANSMISSION LINES	—•—•—
PIPELINES	—⊣⊢—
AREA OF MAXIMUM COAL DEVELOPMENT POTENTIAL	▨
PROPOSED RIGHTS-OF-WAY WINDOW	▒
AREA UNSUITABLE FOR COAL MINING	⬚

↑ N

CONTINUING MANAGEMENT GUIDANCE

This section presents a summary discussion of current resource management in the Rio Puerco Resource Area. It is based on the information contained in an unpublished companion document to this RMP/EIS, the Management Situation Analysis (MSA). The "Existing Management Situation" section of the MSA is a detailed discussion of the existing management guidance applicable to the RPRA. The major sources of this guidance are laws, regulations, BLM manuals, Department of the Interior manuals, executive orders, BLM Washington Office instruction memorandums, and BLM New Mexico State Office instruction memorandums. In addition, the Rio Puerco Livestock Grazing Management Environmental Statement (USDI, BLM 1978b), portions of the East Socorro Grazing Management Environmental Statement (USDI, BLM 1979a), and the West Socorro Rangeland Management Program Environmental Impact Statement (USDI, BLM 1982b), and portions of the Ladron (USDI, BLM 1977), Divide (USDI, BLM 1983b), Chaco (USDI, BLM 1981b), and Rio Grande (USDI, BLM 1979c) Management Framework Plans provide guidance for the management of parts of the Rio Puerco Resource Area (Map 2-1 in the Draft). A summary of the land use planning decisions from the Chaco, Divide, Ladron, and Rio Grande MFP's is located in Appendix A in the Draft; the decisions from the grazing EIS's are summarized in Appendix B in the Draft. The MSA and the detailed guidance it contains for the management of the RPRA are considered to be incorporated into the RMP/EIS by reference. As summarized below, management of the resources in the RPRA not affected by the resolution of the issues will be managed based on the detailed guidance contained in the Management Situation Analysis.

Geology, Energy, and Minerals

It is the policy of the BLM to make mineral resources available for disposal and to encourage development of those resources to meet national, regional, and local needs, consistent with national objectives of an adequate supply of minerals at reasonable market prices. At the same time, the BLM strives to assure that mineral development is carried out to minimize environmental damage and to provide for the rehabilitation of lands affected.

Oil and Gas Leasing

As a general rule, all of the public lands not managed under the BLM Interim Management Policy and Guidelines for Lands Under Wilderness Review (USDI, BLM 1979b) (see Map 2-6 of the Draft) are available for oil and gas exploration, leasing, and development. In certain areas, oil and gas leases are issued with only standard stipulations attached. In other areas, leases may have special stipulations attached at the time of issuance to protect sensitive resource values. In highly sensitive areas, where special stipulations are not sufficient to protect important resource values, no surface occupancy stipulations are attached to leases. Site-specific decisions regarding lease issuance and the attachment of appropriate stipulations will continue to be based on the leasing guidelines contained in the Northern New Mexico Oil and Gas Environmental Analysis Record (USDI, BLM 1974a).

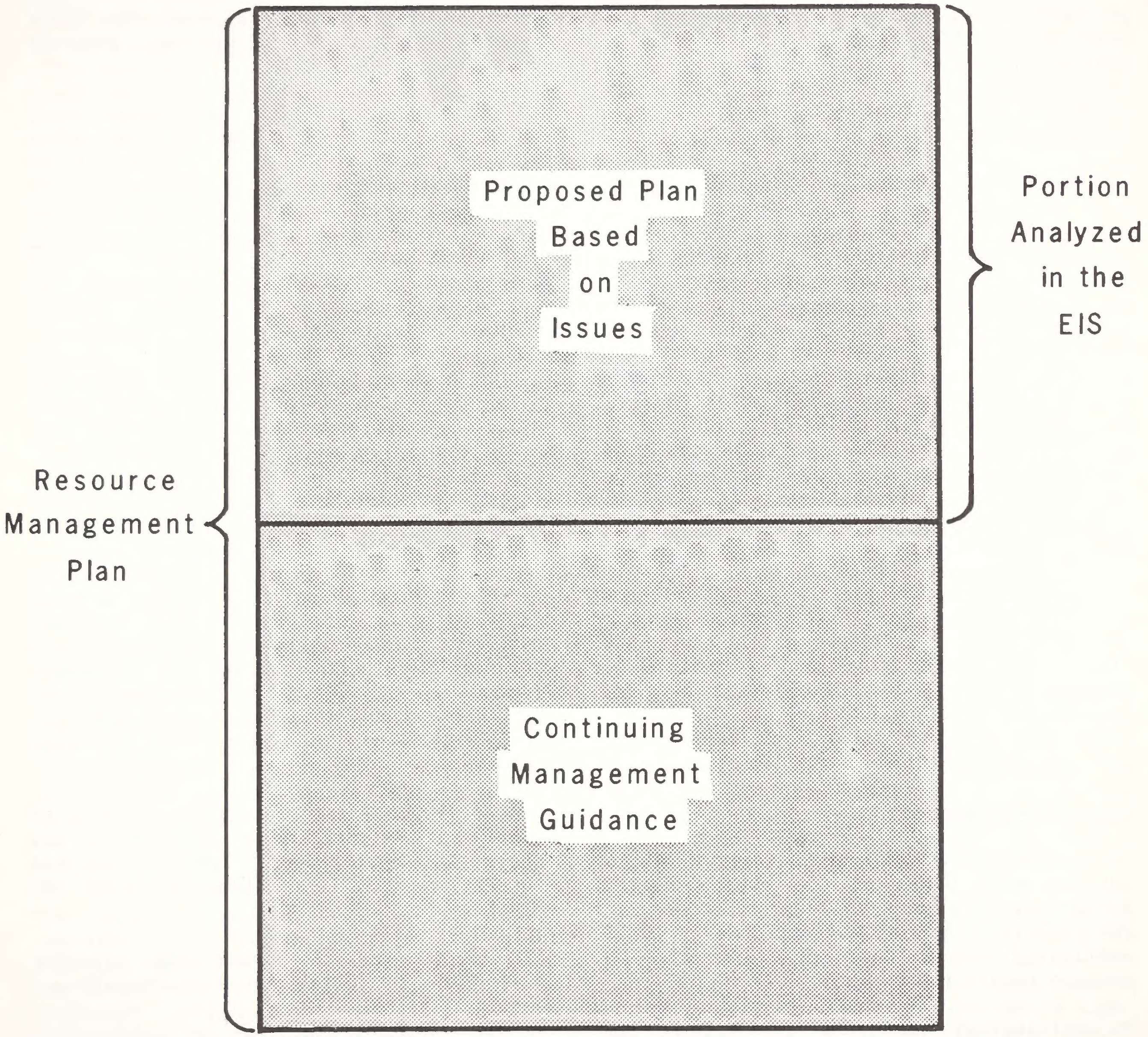
Geothermal Leasing

Although authorized under separate statute and implemented by different regulations, geothermal resource leasing is virtually identical to oil and gas leasing. The same sequence of activities and permitting actions is followed regardless of whether the commodity is oil and gas or geothermal fluids. Site-specific decisions regarding the attachment of appropriate stipulations will continue to be based on guidelines contained in the Technical Report and Environmental Analysis Record for Proposed Geothermal Leasing of Cabezon, San Ysidro, and Santa Ana Mesa Country (USDI, BLM 1976b).

Coal Management

This RMP has identified coal as an issue and makes recommendations as to which lands should be brought forward for further consideration for leasing. Current policy and regulation permit coal leasing and development only through the land use planning system (see Map 2-2 in the Draft). Failure to recommend lands as acceptable for further consideration for coal leasing in this RMP would prevent future coal leasing for the life of the plan unless amended.

FIGURE 2 - 1
RELATIONSHIP OF PROPOSED PLAN TO CONTINUING MANAGEMENT GUIDANCE


Proposed Plan Based on Issues
Continuing Management Guidance
Resource Management Plan
Portion Analyzed in the EIS

Several coal leases already exist within the boundaries of the RPRA (see Map D-1 in the Draft) and will not be affected by recommendations made in any of the alternatives. These leases, some of which date back to the mid-1940's, were awarded under coal leasing regulations which have been superseded by current regulations.

The La Ventana lease, currently held by Ideal Basic Industries, is the site of a proposed underground mine. A mine plan was approved in 1980, but probably will not be implemented in the near future due to a "soft" coal market. Even though opening prospects are poor at this time, the mine could open during the life of the RMP.

Common Variety Mineral Materials

Applications for the removal of common variety mineral materials, including sand and gravel, will continue to be processed on a case-by-case basis. Stipulations to protect important surface values will be attached based on interdisciplinary review of the environmental impacts of each request. The environmental impacts associated with the sale of carbonaceous shale (humates) and stipulations to mititate those impacts have been addressed in an environmental analysis record entitled Humate Sales in Northern Sandoval County (USDI, BLM 1976a).

Locatable Minerals

All public land is open to mineral entry and development unless previously withdrawn. Mineral exploration and development on public land is regulated under 43 CFR 3800 to prevent unnecessary and undue degradation of the land.

Paleontological Resources

The management of paleontological resources affects many users of the public lands. The scientific community, hobby collectors, the minerals industry, and the general public all have an interest in how the BLM manages fossil resources.

Paleontological resources are unique and nonrenewable resources which provide clues to the history of life on earth. They may be easily destroyed or permanently damaged and, once lost, a significant specimen may never again be available for study. The role of the BLM, therefore, is to manage and protect, where necessary, paleontological resources occurring on public lands. The effective management and protection of these resources is dependent upon two elements: the resolution of conflicts through the BLM's planning system, and a spirit of cooperation and informed restraint among public land users.

The objectives of paleontological resource management include the following:

(1) To identify and evaluate paleontological resources so that they may be adequately addressed through the BLM's planning system and environmental analysis documents.

(2) To develop activity plans which carry out the objectives of the RMP or other approved land use plan to protect those paleontological resources considered to be of significant scientific interest. This may be accomplished through salvage or *in situ* mitigation, but should avoid unnecessary constraints on the use of the public land and the development of its resources.

(3) To provide for uses such as scientific collection and research, recreational-hobby collecting, and educational or interpretive activities.

(4) To increase the awareness of Federal land managers and the public regarding paleontological resource management.

(5) To promote consistency among Federal agencies having paleontological resource management responsibilities and facilitate the exchange of information between Federal, state, and local governments and scientific organizations concerned with the management, study, and protection of these resources.

(6) To evaluate for protection, fossils of significant scientific interest which may occur in association with industrial minerals such as coal, humates, sand and gravel, and limestone.

(7) To accord the protection provided under law to scientifically significant fossils.

Consideration of paleontological resources is integrated into the BLM's planning system in order to develop specific guidance through resource management plans, activity plans, and plan amendments. Major phases or components of the paleontological resource management program may be implemented through:

(1) The development and maintenance of paleontological information in order to address impacts to the resource from competing land uses.

(2) Avoidance of or mitigation of impacts to scientifically significant paleontological resources at a level commensurate with their significance.

(3) Development of volunteer or cooperative management agreements and associations with individuals, local organizations, universities, museums, and governmental bodies in order to facilitate the management and protection of paleontological resources.

(4) Monitoring management decisions and actions to ensure that program objectives are met.

(5) Promoting awareness among users of the public lands of the importance of paleontological resources in order to augment management and protection objectives. Efforts will continue to be made to avoid focusing attention on the exact location of scientifically significant paleontological resources if such attention would conflict with management objectives for these resources.

Effective October 1, 1984, the authority of the Secretary of the Interior to issue permits for archeological and paleontological investigations under the Antiquities Act (16 U.S.C. 432, 433) was delegated to the Assistant Secretaries of the Interior. Subsequently, this authority was redelegated to the Director of the BLM and the various State Directors. Paleontological investigation permits for public lands are now issued through the BLM State Offices.

Soil, Water, and Air Resources

The Soil, Water, and Air Program will continue to provide support to other resource activities in the Resource Area. The Program will also continue to emphasize protection, maintenance, and enhancement of the soil, water, and air resources.

Soil

Participation with the USDA Soil Conservation Service in the National Cooperative Soil Survey will continue. Evaluation and updating of older soil surveys will continue as needed to provide a current data base. Detailed soil surveys for individual projects will be conducted as needed.

Water

Control of erosion and sediment production from public lands remains a high priority management goal. Therefore, emphasis will be placed on continuing the following watershed activities:

Rio Puerco Hydrology Study. This program is designed to measure runoff and sediment production from three types of grazing systems. This is part of a program to evaluate whether management objectives are being met within the Rio Puerco Grazing ES area (USDI, BLM 1978b). The three watersheds in the Hydrology Study are proposed for special management in the Pelon Watershed, Ojito, and San Luis Mesa Raptor Area SMA's proposed in the Resource Production, Resource Conservation, and Balanced Management Alternatives (see Appendix C).

Dam Safety Program. The first phase of the Dam Safety Program is an inventory of the dams in the Albuquerque District, assessing the condition of each structure. The second phase includes the development of a maintenance and rehabilitation schedule for all structures, and preparation of Emergency Action Plans for High Hazard dams (those dams for which dam failure represents a threat to life or property).

Soil and Hydrology Research. The BLM is partially funding the USDA Forest Service Rocky Mountain Forest and Range Experiment Station at Albuquerque to conduct research on soil organic matter and the hydrologic effects of grazing on runoff and sediment yield within the Rio Puerco Grazing ES area.

Water Use Inventory and Water Rights Program. This program will continue to identify and quantify water needs for public lands. The Water Use Inventory is scheduled for completion by the end of 1986.

Watershed Activity Plans. Development of comprehensive watershed plans by 1990 for the Governor, Trechado, Monte Seco, and San Jose watersheds is specified in the Divide MFP (USDI, BLM 1983b). The Ladron MFP (USDI, BLM 1977) calls for reduction of erosion through grazing management, development of water control structures, and reduction in erosion related to vehicular travel. Reduction of erosion through implementation of Allotment Management Plans (AMP's) on allotments suitable for intensive management was expected because of increased vegetative cover.

Within the Rio Puerco Grazing ES area, modification of existing Allotment Management Plans that adequately address watershed problems is preferred to development of a separate watershed activity plan. Those allotments without AMP's, but containing areas identified in the ES as having either a critical or severe watershed condition, will have watershed activity plans developed. This direction was provided in the Rio Puerco Watershed Management Plan (USDI, BLM 1974b) and the Rio Puerco Special Project Evaluation Report (USDI, BLM 1972).

Some areas of public lands have never had a watershed inventory or a watershed activity plan developed. This includes lands in Torrance and Bernalillo Counties and those public lands in the southwest corner of Sandoval Country adjacent to Cibola County. Recent range surveys have identified gully erosion areas and watershed activity plans will be developed. In Torrance County the effort in watershed inventory and activity planning will be limited to those lands not identified as suitable for disposal in this RMP.

A broad watershed activity plan will be developed for the entire RPRA using the existing plans and data, consolidating the various decision documents, and setting priorities for project level planning in the watershed program.

Air

Cooperation and participation in the National Atmospheric Deposition Program will continue with data collection from the acid rain gauge in Cuba, New Mexico. These data are part of a national air quality information base.

Prevention and reduction of air quality impacts from activities on public lands is accomplished by mitigation measures developed on a case-by-case basis through the NEPA process. Activities such as road construction and mining have dust abatement programs as part of their permits or contracts.

Range Resources

The grazing program in the RPRA is authorized by The Taylor Grazing Act of 1934, The Federal Land Policy and Management Act of 1976, The Public Rangelands Improvement Act of 1978, and The Bankhead-Jones Farm Tenant Act of 1937. In addition to issuance of grazing permits and leases, unauthorized use detection and abatement, allotment supervision, and other actions authorized by the previously mentioned legislation, three grazing environmental impact statements (USDI, BLM 1979a, 1978b, 1982b) have been completed and approved in compliance with the Final Judgement of the National Resources Defense Council v. Morton Law Suit, Civil No. 1983-73 (see Map 2-3 in the Draft). These environmental statements provide further program guidance through proposed actions and management objectives for approximately 793,982 acres of public land within the RPRA. The guidance established in these environmental statements will be implemented by continuously monitored grazing decisions. The proposed actions of these environmental statements and subsequent management decisions have been incorporated into this RMP (see Appendix B in the Draft).

Activity plans will continue to be prepared to implement the management proposed in the grazing decisions, with site-specific environmental assessments (EA's) used to analyze actions proposed in the activity plans. These EA's will be developed in accordance with NEPA requirements.

Rio Puerco Livestock Grazing Environmental Statement

The Rio Puerco Livestock Grazing Environmental Statement (USDI, BLM 1978b) proposed to initiate an intensive livestock grazing management program on approximately 393,083 acres of public land in Sandoval and McKinley Counties. To implement this program, allotment management plans (AMP's) were developed for each allotment in the ES area to improve ecological condition to acceptable levels, reduce soil erosion, improve water quality, provide sufficient forage for livestock and wildlife, and enhance other environmental values.

East Socorro Livestock Grazing Environmental Statement

The East Socorro Livestock Grazing Environmental Statement (USDI, BLM 1979a) proposed to implement a grazing management program based on the growth requirements of the vegetation for approximately 112,629 acres of public land in Valencia County and the eastern portion of Cibola County. To implement this program, eight new AMP's were developed and four revised. These AMP's provide for the accomplishment of the following goals: (1) enhance the vegetative resource, (2) improve range condition, (3) reduce erosion and sedimentation damage, (4) improve water quality, (5) provide quality habitat for wildlife, (6) improve the recreation and visual resources, (7) provide a continuous supply of livestock forage, and (8) protect archeological and historic sites.

West Socorro Livestock Grazing Environmental Impact Statement

The West Socorro Livestock Grazing Environmental Impact Statement (USDI, BLM 1982b) proposed to protect and enhance the soil and vegetative resources of the EIS area, enhancing livestock forage, watershed, wildlife habitat, recreation and aesthetics, and socio-cultural and economic values on approximately 288,270 acres of public land in Cibola and Valencia Counties.

To accomplish these management goals, grazing management prescriptions were developed for each of the thirty-seven allotments in this area, including required and optional grazing strategies. The consultation, coordination, and cooperation process required by Section 8 of the Public Rangelands Improvement Act of 1978 has been initiated with the affected grazing allottees. Based on this process, grazing management strategies, including the identification of needed range improvements, will be developed and implemented by grazing decisions which will accomplish the goals and objectives established in the EIS.

Selective Management Categorization

Each of the 121 grazing allotments in the RPRA covered by the three grazing ES/EIS's (USDI, BLM 1978b, 1979a, 1982b,) has been placed into one of three Selective Management Categories based on present resource conditions and potential for improvement. Management categorization allows the establishment of priorities for implementing grazing management based on the need for management and potential for improved range condition, with consideration for cost-effectiveness.

The three selective management categories are: Maintain (M), Improve (I), and Custodial (C). The "M" category allotments will be managed to maintain current satisfactory ecological condition. The "I" category allotments will be managed intensively to improve unsatisfactory ecological condition and resolve resource conflicts. The "C" category allotments will be managed to prevent resource degradation. The "C" allotments have a low potential for improved ecological condition; improvement is not economically feasible; and/or current management is satisfactory, considering the current resource conditions.

Monitoring Studies

Three types of vegetative monitoring studies are being conducted on public land in the RPRA. Condition and trend studies are being established and conducted in accordance with the Public Rangelands Improvement Act of 1978. Intensive vegetative monitoring studies, including the collection of precipitation, utilization and actual use data, are being conducted on the "I" category allotments to evaluate the success of changes in grazing management and to aid in the determination of livestock grazing capacities. In addition, the USDA Forest Service Rocky Mountain Forest and Range Experiment Station is conducting vegetative studies in the Rio Puerco Grazing ES (USDI, BLM 1978b) area in support of the results of the intensive monitoring studies.

Continuing Management Guidance for Resolution of the Vegetative Uses Issue

This issue considers the range resource on the public lands that were not covered by the RPRA's three approved grazing ES/EIS's. The following discussion describes how changes in grazing management would be implemented to accomplish the alternatives set forth in this RMP.

Each of the ninety-two allotments in the vegetative uses issue area has been placed into one of three selective management categories based on the present resource condition and the potential for improvement (Appendix S in the Draft). Selective management categorization provides a system for establishing priorities for implementing changes in grazing management based on the need for improved management, and the potential for improved ecological condition, with consideration for cost-effectiveness. Selective management categories can be changed as additional resource data become available. Changes in categories would result in management changes appropriate to the new category, consistent with the objectives of the approved RMP.

Allotment-Specific Management Actions for the Improve (I) Category. Each "I" allotment either has resource conflicts that could be resolved by changes in management or is in less than acceptable ecological condition. Appendix M in the Draft displays these allotment resource conflicts. The priorities for resolution of wildlife habitat, watershed, and livestock grazing use conflicts differ for each alternative.

Implementing Changes in Allotment Management. Specific management prescriptions to resolve the identified resource conflicts will be developed in Allotment Management Plans (AMP's) following completion of this RMP. These AMP's will be prepared in consultation, cooperation, and coordination with the affected allottees and/or other affected parties in accordance with Section 8 of The Public Rangelands Improvement Act of 1978, and with input from other RPRA specialists to ensure that all resource needs are considered. The manner and extent to which livestock grazing use will be conducted and managed will be specified in these AMP's, and will be consistent with the objectives of the RMP.

Livestock Grazing Management and Use Adjustments. Adjustments are made by changing one or more of the following: the kind or class of livestock grazing on the allotment, the season of use, the Animal Unit Months (AUM's) authorized for grazing, and/or the pattern of grazing. For each alternative in this RMP, short- and long-term estimates of the AUM's which would be available for livestock grazing use have been made (see Table 2-1, and Appendix P in the Draft). Generally, the estimated changes in AUM's available for livestock grazing use are applicable to the "I" allotments; however, use adjustment will continue for the "M" and "C" allotments in response to changes in resource demands and conditions.

These estimated changes in livestock grazing use are based on the best data currently available. The final determination of the livestock grazing use adjustments needed will be based on a program of systematic vegetative monitoring studies as well as the current vegetative data base. BLM Instruction Memorandums WO-82-292, WO-82-650 and NM-82-280 (USDI, BLM 1982c, 1982e, 1982f) discuss the application of the vegetative monitoring studies in more detail.

Vegetative monitoring studies will also be used to evaluate the changes in resource condition resulting from grazing management practices and to evaluate the effectiveness of changes in grazing management to resolve the identified resource conflicts.

The changes in AUM's allocated for livestock grazing use can be implemented either through documented mutual agreement with the affected allottee or by grazing decision. Adjustments through mutual agreement may be implemented after the public review period of the Resource Area Rangeland Program Summary. Adjustments implemented by grazing decision will be based on consultation with the affected allottee and will be in accordance with the guidance in the Federal regulations (43 CFR 4110.3-3). The regulations specify that permanent increases and decreases in allocations of livestock forage "shall be implemented over a five-year period...."

Rangeland Improvements. Rangeland improvements would be implemented for each alternative in this RMP, with the exception of the continuation of Current Management Alternative and will be developed in accordance with BLM Instruction Memorandum WO-83-27 (USDI, BLM 1982d). Typical rangeland improvements and the general procedures to be followed in implementing them are described in Appendix N in the Draft. Future rangeland improvements will be designed and constructed to meet the management objectives proposed in the RMP. The extent, location, and timing of such actions would depend on the improvements needed for each allotment, allottee contributions, and BLM funding capability, and would be developed with consideration for other resource uses.

All allotments for which rangeland improvement funds are to be spent will be subjected to economic analysis. This analysis will be used to develop a final priority ranking of allotments for the commitment of the range improvement funds needed to implement AMP's. In general, the highest priority for implementation will be assigned to those improvements for which the total anticipated benefits exceed the costs.

Grazing Systems. Grazing systems will be implemented for each alternative except the Continuation of Current Management Alternative. The type of system to be implemented will be based on consideration of the following factors: the degree and type of resource conflicts; resource characteristics, including vegetation potential and water availability; allottee needs; and implementation costs. Typical grazing systems available for consideration are described in Appendix O in the Draft.

Tracts Unleased for Grazing

Approximately 11,817 acres of unleased public land generally will remain available for consideration for authorized grazing in accordance with the BLM grazing regulations (43 CFR 4110 and 43 CFR 4130). However, an estimated 7,092 public acres in Torrance County are unsuitable for livestock grazing use and are expected to remain unleased. Any of these public lands leased for grazing in the future will be managed in accordance with the objectives of the approved RMP. A grazing lease authorizes the use of public lands outside grazing districts under Section 15 of The Taylor Grazing Act for the purpose of grazing livestock only.

Wildlife

National legislation such as FLPMA, The Endangered Species Act of 1973, The Public Rangelands Improvement Act of 1978, and The Sikes Act of 1960, as amended, have directed the BLM to improve management of wildlife habitat to meet wildlife needs in the face of increasing demands for basic energy supplies, building materials and food products. It is the responsibility of the RPRA to identify opportunities to maintain, improve and expand wildlife habitat on the public lands for both consumptive and non-consumptive use and identify portions of the wildlife resource deserving special attention.

Inventories

The RPRA maintains a current inventory of wildlife habitat and species occurrence. This information is used in land use planning, habitat management, and multiple use decisions. All actions in the RPRA are reviewed and given site-specific analysis during the environmental assessment process to determine whether the action will affect a threatened, endangered, or rare species, wetland, or riparian area. Also considered are impacts to resident species' habitat or habitat improvement projects and compatibility with the New Mexico Department of Game and Fish Comprehensive Wildlife Plan (N.M. Department of Game and Fish 1980). Conservation measures will continue to be taken to protect rare plants listed by the New Mexico Heritage Program (1983). All range and watershed improvements will continue to be designed to achieve both range and wildlife objectives. This includes location and design of waters and vegetation manipulation projects. Fences are designed so as to cause the least resistance to wildlife movement.

Animal Damage Control

Animal damage control activities on public lands in the RPRA are guided by Department of the Interior policy and the annual Animal Damage Control Plan for the Albuquerque District prepared jointly by the U.S. Fish and Wildlife Service (FWS) and the BLM. The FWS has overall responsibility for the program and supervises all control activities. The BLM has approval responsibility for the specific control actions on public land.

Habitat Management

The Upper Rio Puerco, Ojo del Espiritu Santo Grant, and El Malpais (USDI, BLM 1981f, 1978c, 1981d) Habitat Management Plans and the Bluewater Canyon Action Plan (USDI, BLM 1983d) covering 534,932 acres of public land are being implemented in the RPRA. Projects will be developed as identified in the HMP's as funding becomes available. Completed projects which continue to meet wildlife habitat objectives will be maintained. The Habitat Management Plans will be revised as needed to reflect changes in policy and to accommodate wildlife range expansion.

Woodland Resources

The forestry program within the RPRA consists of managing limited ponderosa pine stands and more extensive pinyon-juniper woodlands. Congress has mandated through FLPMA that the forestry and woodland program be managed on the basis of multiple use and sustained yield. The Material Disposal Act of 1947, as amended, establishes the authority under which the BLM disposes of timber and other forest products.

The Ladron and Divide MFP's (USDI, BLM 1977, 1983b) established woodland and timber management goals for the public land in Valencia and Cibola counties. These decisions have been incorporated into this RMP/EIS (see Appendix A in the Draft) and will be implemented during the activity planning phase.

Ponderosa Pine

The long term goal of ponderosa pine management in the RPRA is to increase reproduction and stand vigor, as well as to reduce encroachment of pinyon-juniper into the ponderosa pine stands. Providing for the long-term maintenance of the ponderosa pine stands is also a goal of the program. Since existing ponderosa pine is managed for enhancement and protection of the stands, rather than the maximization of forest products, no specific allowable cut goals will be established for this species in the RPRA. All forestry practices currently being implemented in the RPRA are in conformance with standard silvicultural practices and the 1981 environmental assessment Timber Management Plan (USDI, BLM 1981e), covering the BLM Albuquerque and Socorro Districts.

In addition to the guidelines contained in the Timber Management Plan, other silvicultural practices are currently being implemented in the RPRA. Season of harvest may be varied to minimize conflicts with other resources. Slash is disposed of in a manner conducive to revegetation and protection of the site. Slash burning complies with State of New Mexico air quality regulations. Harvest cuts are laid out in such a manner as to reduce the risk of windthrow. A snag management program is being implemented to enhance bird habitat. All activity plans developed for forestry and woodlands products are examined through the NEPA process and are subject to public review and participation.

Pinyon-Juniper

The main guideline document for the woodland (pinyon-juniper) program is the Public Domain Woodlands Management Policy Statement (USDI, BLM 1982g). The long-term goals of the woodland management program in the RPRA are to establish and maintain healthy stands producing fuelwood on a sustained yield basis in established woodland management areas, to reduce trespass cutting throughout the RPRA, and to manage stands with consideration for other forest and woodland product yields.

The pinyon-juniper woodlands within the RPRA are managed on a sustained yield basis. However, in some cases pinyon-juniper woodlands are harvested in such a manner as to prevent the reestablishment of the stand in order to promote other resource management objectives. For example, pinyon-juniper woodland has been intentionally reduced in the past to develop wildlife habitat and promote the growth of ponderosa pine stands.

Slash treatment follows the same guidelines identified for the ponderosa pine program. The first priority sources for fuelwood supply in the RPRA are, when practical, dead-and-down wood from chainings and chemically-treated areas, right-of-way clearings, and tree-thinning areas. Greenwood areas are utilized last. Specific silvicultural standards are established at the activity planning stage and are written on a site-specific basis. The silvicultural standards are consistent with acceptable methods for the species and site.

Recreation

Recreation programs in the RPRA are managed according to multiple use principles, unless specified otherwise by law. The RPRA's primary goal is to ensure the continued availability of outdoor recreation opportunities which are not readily available from other sources. Recreation use is managed in order to protect the health and safety of the users, to protect natural and cultural resource values, and to promote public use and enjoyment of the public lands. RPRA management priority is given to undeveloped areas currently experiencing resource damage, user conflicts, or threatening visitor safety. Management priority is also given to those areas where use exceeds current capacity and to areas near urban centers. Additionally, unique and/or scenic attractions adjoining heavily travelled highways are managed on a priority basis. Other priorities are preservation and protection of natural and cultural resources, including scenic, historic, and archeological values, and primitive environments.

Recreation resources will continue to be evaluated on a case-by-case basis as a part of project level planning. Such evaluation will consider the significance of the proposed project and the sensitivity of recreation resources in the affected area. Stipulations will be attached as appropriate to assure compatibility of projects with recreation management objectives.

Off-Road Vehicles (ORV)

It is the policy of the RPRA to manage the ORV program to protect the resources of the public lands, to promote the safety of all users of those lands, and to minimize conflicts among the various uses of those lands. All organized commercial and competitive ORV events are examined through the NEPA process on a case-by-case basis. Permit stipulations for the various approved events are designed to limit adverse impacts that ORV use may have on the natural and human environment. Emergency ORV "limited" or "closed" designations are made on a case-by-case basis to prevent unnecessary degradation of resources, to ensure visitor safety, or to resolve user conflicts. Emergency closures remain in effect only until either an interim or standard designation can be made, or until the adverse effects are eliminated and measures to prevent their recurrence have been implemented. Interim designations are used when the normal planning schedule does not permit the timely resolution of ORV-related issues through the RMP process.

The Bluewater Area of Critical Environmental Concern in Cibola County is closed to all motorized vehicle use (see Map 2-4 in the Draft). Motorized vehicle use in the El Malpais Wilderness Instant Study Area (ISA) is limited to existing roads and trails (see Map 2-5 in the Draft). The RPRA has **twelve** Wilderness Study Areas (WSA's) and one Wilderness Instant Study Area being administered under Interim Wilderness Management Policy (USDI, BLM 1979b) (see Map 2-6 in the Draft). Under this policy, motorized vehicle use in all of these areas is limited to existing routes. Cross-country travel is allowed only by permit.

Wilderness

Wilderness resources in the RPRA have been inventoried using the BLM Wilderness Inventory Handbook (USDI, BLM 1978a) and are currently being managed under the Interim Management Policy and Guidelines for Lands Under Wilderness Review (USDI, BLM 1979b). This management emphasis will continue until Congress decides which lands are suitable or unsuitable for Wilderness designation.

The RPRA manages **twelve** Wilderness Study Areas (WSA's) and one Wilderness Instant Study Area (ISA). **The seven of these areas with BLM-managed surface, but with mineral estate in private ownership (split estate), were recently reinstated as Wilderness Study Areas as a result of resolution of a court case to determine their suitability for WSA status. See Table 2-2 for a summary of current status and recommendations** for Wilderness Study Areas, and the El Malpais Instant Study Area.

The task of assessing Wilderness suitability is being completed for the public lands in New Mexico on an accelerated, Statewide basis and is occurring entirely outside of the RMP process. A revised Statewide Draft Wilderness EIS is scheduled for release during **1986 and will include the areas reinstated as Wilderness Study Areas.** This document will be incorporated into a wilderness study package to be submitted through the Department of the Interior to the President by October 21, 1991. The President will have two years to review the document and forward it to Congress for final review and approval. Any acreage designated as Wilderness will become part of the National Wilderness System and be managed under the Wilderness Management Policy (USDI, BLM 1981g).

The Rio Puerco RMP will make no assumptions concerning the final outcome of the New Mexico State Wilderness Study. Any recommendations made through the RMP concerning lands currently being managed under the Interim Management Policy and Guidelines for Lands Under Wilderness Review (USDI, BLM 1979b) will be confined to the identified RMP issues.

Additional Designations

Portions of the El Malpais have been designated as an Outstanding Natural Area, Natural Environmental Area, and as a National Natural Landmark. These designations overlap with the El Malpais Wilderness Instant Study Area (see Map 2-5 in the Draft).

Visual Resources

Visual resources will continue to be inventoried and evaluated as a part of

TABLE 2-2

WILDERNESS STUDY AREAS CURRENTLY MANAGED UNDER INTERIM MANAGEMENT POLICY AND GUIDELINES FOR LANDS UNDER WILDERNESS REVIEW

Name	Current Wilderness Recommendation	Current Status*
Ojito	Suitable for Wilderness	Wilderness Study Area
Cabezon	Suitable for Wilderness	Wilderness Study Area
La Lena	Unsuitable for Wilderness	Wilderness Study Area
Empedrado	Unsuitable for Wilderness	Wilderness Study Area
El Malpais	Suitable for Wilderness	Instant Study Area**
Ignacio Chavez***	Under Study	Wilderness Study Area
Chamisa***	Under Study	Wilderness Study Area
Rimrock***	Under Study	Wilderness Study Area
Sand Canyon***	Under Study	Wilderness Study Area
Pinyon***	Under Study	Wilderness Study Area
Petaca Pinta***	Under Study	Wilderness Study Area
Little Rimrock***	Under Study	Wilderness Study Area
Manzano***	Under Study	Wilderness Study Area

* All Wilderness Study Areas will be analyzed in a revised draft of the Statewide EIS except for El Malpais which was analyzed in the Draft Environmental Impact Statement and Wilderness Study Report for Wilderness Designation of El Malpais (USDI, BLM 1981c).

** Instant Study Areas are public land areas, formally designated as Natural or Primitive areas prior to November 1, 1975, which were automatically designated as Wilderness Study Areas.

*** These areas were reinstated as Wilderness Study Areas on April 18, 1985 as a result of the decision in Sierra Club, et al. v. Watt, et al. (No. Civil 2-83-035 LKK).

activity and project planning. A contrast rating process will be used as a project assessment tool during environmental review of affected areas. Stipulations will be established as appropriate to assure compatibility of projects with management objectives for visual resources.

Areas designated as Wilderness will be subject to Class 1 Visual Resource Management (VRM) guidelines. Wilderness Study Areas have been placed in an interim Class II category. Areas recommended for or designated as Intensive Recreation Special Management Areas or Areas of Critical Environmental Concern for recreational or scenic values will be subject to Class II VRM guidelines. See Appendix J in the Draft for a description of four VRM classes.

Cultural Resources

The RPRA manages cultural resources on the public lands in a manner that protects and provides for the proper use of those resources. Cultural resources include archeological, historic, and socio-cultural properties. The degree of management is commensurate with the scientific or socio-cultural values of the resource, the degree of threat, and the resource's vulnerability. Under this concept, the RPRA attempts to protect a representative sample of the full array of cultural resources, both prehistoric and historic, found on BLM-administered land.

Federal laws such as The National Historic Preservation Act of 1966, The Archeological and Historic Preservation Act of 1974, The Archeological Resources Protection Act of 1979, The American Indian Religious Freedom Act of 1978, and FLPMA provide for the protection and management of cultural resources.

Inventory and Evaluation

The BLM undertakes and maintains a cultural resource inventory for all Bureau-administered lands. These inventories are categorized into three classes: Class I--Existing inventory or literature search, Class II--Sampling field inventory (all sampled units are inventoried to Class III standards), and Class III--Intensive field inventory. In most cases, a Class III inventory is required before any surface disturbance may occur.

The RPRA maintains a cumulative site inventory file documenting the locations of all known sites, all areas surveyed, as well as areas known to be devoid of cultural resources.

Cultural resources in the RPRA are organized into five classes which roughly parallel traditional Southwestern cultural distinctions: (1) PaleoIndian, (2) Archaic, (3) Pueblo, (4) Historic, and (5) Unknown. These classes are management classifications and are synthetic in the sense that they generalize broad, temporally-based classes of sites, allowing the development of long-term management strategies appropriate to a particular class (see Appendix K in the Draft).

The management goal category system (see Appendix K in the Draft) establishes long-term strategies for each of the five classes of cultural resources. These goal categories provide the basis for committing individual cultural resource sites or properties to a specific use category.

The BLM uses a use category system (see Appendix K in the Draft) to evaluate cultural resources. This use category system is based on the consideration of actual or potential use of individual sites or properties. These use categories are: (1) Current Scientific Use, (2) Potential Scientific Use, (3) Conservation for Future Use, (4) Management Use, (5) Socio-Cultural Use, (6) Public Use, and (7) Discharged Use (see Appendix K in the Draft).

Nominations

The BLM prepares and submits nominations of priority cultural resource properties located on the public lands to the National Register of Historic Places. BLM also coordinates with other agencies and organizations in nominating cultural resources eligible for inclusion in various other Federal, State, and local cultural resource registry systems.

Cultural Resource Management Plans

The RPRA is currently implementing one Cultural Resource Management Plan (CRMP), for the Guadalupe Ruin Chacoan outlier (USDI, BLM 1981a). Future CRMP's will be developed for some of the Special Management Areas identified in this RMP. Other CRMP's for specific cultural resource properties may also be developed if the management objectives are consistent with the approved RMP.

Protection and Utilization

The RPRA's cultural resource management program protects cultural resources on a limited basis through the application of both administrative and physical measures as necessitated by the cultural resource's scientific and socio-cultural value, vulnerability, and degree of threat. Interim protection will focus primarily on a patrol and surveillance effort, conducted on an irregular basis, until specific cultural resource management objectives are developed. An active program of signing cultural resource properties under threat of active or potential vandalism will continue.

The BLM issues cultural resource use permits for cultural resource inventory, collection, and excavation on public land. These permits are an important tool for managing the scientific use of cultural resources. In addition, cultural resources will continue to be made available for scientific and socio-cultural use, consistent with the specific use and protection objectives for the resource.

Compliance

The BLM takes into account the effects of its actions or authorizations on cultural resources. Adverse impacts to cultural resources are avoided whenever possible or practical. When adverse impacts caused by BLM projects or BLM-authorized actions cannot be avoided, mitigation may be conducted. The nature of mitigation implemented depends upon the impact, and the scientific and socio-cultural values of the resource involved. As required, these actions are coordinated with the State Historic Preservation Officer and the National Advisory Council on Historic Preservation.

Lands and Realty

Public Land Exchanges

The RPRA has an active land exchange program. The RPRA is currently concentrating its exchange efforts in Cibola and Valencia Counties under decisions contained in the Ladron, Rio Grande, and Divide MFP's (USDI, BLM 1977, 1979c, 1983b). All exchange proposals are examined in conformance with NEPA requirements, including extensive public review. Public lands which leave Federal ownership as a result of exchange actions have been identified as suitable for disposal in an approved planning document.

On October 3, 1984, the New Mexico Bureau of Land Management State Director and the Commissioner of Public Lands of the State of New Mexico signed a Memorandum of Understanding to establish a comprehensive, long-term Statewide land exchange program between the BLM and the State of New Mexico (USDI, BLM 1984f). The objectives of this program are to improve the land management potential of both State and Federal lands; eliminate unnecessary Federal and State conflicts generated by existing ownership patterns; facilitate the management of State and BLM lands by substantially realigning the scattered State and BLM sections and creating solid block or consolidated land ownership; and develop procedures that are most expeditious and cost effective.

Public Land Withdrawals

It is the policy of the BLM to keep the public lands open for public use and enjoyment. However, there are conditions which warrant the removal of certain public lands from general use. Through withdrawal of these public lands, the public safety is guaranteed and the integrity of the special uses is assured. In an effort to keep as much of the public land open to the widest variety of uses, the RPRA reviews all existing withdrawals on a periodic basis. Such review ensures that the reasons for the restrictions are still valid and that the smallest acreage possible is included in withdrawal status.

Secretarial Orders have been used in the Rio Puerco Resource Area to withdraw public lands from general use by transferring management responsibility to other Department of the Interior agencies, such as the Bureau of Indian Affairs and the Bureau of Reclamation. Public lands have also been transferred by Executive Order to agencies outside of the Department of the Interior such as the Department of Agriculture Forest Service, the Department of Defense, and the Federal Aviation Administration.

Withdrawals to the BIA for the purpose of benefitting Indian groups will only be used for segregating the land from operation of the other land and mining laws in preparation for the processing of a land exchange or sale. They will not be used for transferring management responsibility.

Indian Land Claims

The Canoncitos, Zias, Santa Anas, Santo Domingos, San Felipes, and Acomas have all expressed an interest in acquiring certain tracts of public land because of aboriginal use or for the purpose of improving their economies. These tracts can be transferred to the pueblos and tribes through land exchanges, sales, or direct transfers via Congressional legislation. The BLM can not support direct transfers without considering the resource values lost to the general public. Consequently, a land exchange is usually the preferred method of transfer since resource values lost in the transfer are replaced by other values that will benefit the general public. Less desirable than an exchange, but more favorable than a direct transfer, is a public land sale. A sale would at least benefit the general public by returning the money collected from the sale to the United States Treasury.

This approach is not only consistent with the Federal Land Policy and Management Act of 1976 (90 Stat. 2744), but it also agrees with the Indian Land Consolidation Act of 1983 (96 Stat. 2515). When an Indian exchange or sale proposal is determined to be in the public interest, then a cooperative agreement may be used to aid in implementing the proposal.

Rio Grande Occupancy Resolution Program

The Rio Grande Management Framework Plan (USDI, BLM 1979c) identified unauthorized occupancy on public land along the Rio Grande as one of the major problems affecting the BLM's management effort. Over the years, land titles had become hopelessly tangled, with pieces of public land being sold with private land in private transactions, usually inadvertently. This eventually led to a serious problem of clouded titles which prevented individual land owners from obtaining home improvement loans and title insurance. BLM management options were also severely restricted since private dwellings and improvements encumbering public lands preclude public use.

As a result of the MFP decisions, the Rio Grande Occupancy Resolution Program (RGORP) was initiated in June 1979 to resolve unauthorized occupancy within the program area. Disposals under the RGORP are normally made under The Color-of-Title Act of 1928, as amended, The Color-of-Title Act of 1932, and The Act of December 12, 1980. If the Color-of-Title Acts do not apply to a particular occupancy, then Section 203 of The Federal Land Policy and Management Act of 1976 or The Recreation and Public Purposes Act of 1926, as amended, may be used.

As the unauthorized occupancy problem in the Albuquerque area is resolved, the program emphasis in the RPRA will shift to public lands within the town of Bernalillo, and then to the rural areas of Valencia County. The entire RGORP in the RPRA is tentatively scheduled for completion in 1988.

Sales of Public Lands

The RPRA maintains a record of individuals, businesses, and other organizations interested in purchasing public lands. Sales of public lands identified as suitable for disposal in an approved land use plan are administered on a case-by-case basis. All sale actions are examined through the NEPA process and are subject to public participation and review.

Recreation and Public Purposes

Under the Recreation and Public Purposes Act (R&PP), the RPRA has the authority to lease or patent public land to governmental and non-profit entities for public parks, building sites, and sanitary landfills at less than fair market value. Applications for use of public lands under the R&PP Act are processed as a RPRA priority. Such applications are processed under the requirements of NEPA and are subject to public review.

Rights-of-Way

The RPRA grants rights-of-way, leases, and permits to qualified individuals, businesses, and governmental entities for the use of the public lands. These rights-of-way are issued so as to protect natural and cultural resources associated with the public lands and adjacent lands. Rights-of-way are also issued to promote the maximum utilization of existing rights-of-way, including joint use whenever possible. All right-of-way actions are coordinated, to the fullest extent possible, with Federal, State and local government agencies, adjacent land owners, and interested individuals and groups. All right-of-way applications are analyzed on a case-by-case basis.

Rights-of-way corridors were designated though sections of Cibola and Valencia Counties by the Divide and Ladron MFP's (USDI, BLM 1983b, 1977). The purpose of these corridor designations is the prevention of haphazard right-of-way placement and the reduction of adverse environmental impacts. The designated corridors also decrease the repeated analysis of alternative routes during the NEPA process.

Support Programs

To help accomplish the objectives of the resource management programs the BLM has three support programs: Fire Management; Access, Transportation, and Right-of-Way (ATROW); and Cadastral Survey Programs.

Fire Management

The RPRA will continue to participate in the "Joint Powers Agreement" between the State of New Mexico and the United States Departments of Agriculture and the Interior. This agreement provides for mutual wildland fire assistance between the participating agencies. The RPRA is covered by the Cibola and Santa Fe Operating Units established under this agreement.

The RPRA will continue to carry out the BLM's basic suppression policy of initial attack of all wildfires on or threatening public lands with the objective being to contain the fire during the first burning period. This policy is followed unless altered in the Normal Fire Year Plan. Fires will be suppressed on all non-public lands in the RPRA initial attack zone.

BLM policy provides for limited fire suppression action in areas where the expense associated with the usual suppression procedures is not warranted. BLM determines the appropriate response to a wildland fire based upon suppression difficulty, the resource values threatened, and hazards to fire crews. The need for limited suppression areas is normally identified by the Fire Management Officer with the concurrence of the various resource specialists. Crew safety along with economic factors are normally the principal objectives in designating an area for limited suppression.

The El Malpais Outstanding Natural Area (ONA) is the only limited suppression area in the RPRA. Under the limited suppression designation approved in 1976, all fires within the ONA are monitored by qualified fire management personnel. Each fire is evaluated and those determined to be threats to life and/or property, or to have the potential to cause excessive resource damage are suppressed.

The RPRA has a prescribed burning program. Prescribed burns are conducted as part of range, wildlife, and watershed protection and/or improvement projects. These burns are analyzed on a project-by-project basis in compliance with NEPA. All prescribed burns are the result of various approved Allotment Management Plans, Habitat Management Plans, or Watershed Protection Plans.

ATROW

The RPRA has an active easement acquisition program to facilitate the management of the public lands and their use by the general public. The need to acquire legal access across certain private lands in Sandoval County was identified in the 1978 Rio Puerco Livestock Grazing Environmental Statement (USDI, BLM 1978b).

Various activity plans are being developed to implement the Divide MFP (USDI, BLM 1983b). These activity plans will identify specific locations where legal access needs to be acquired. As the activity plans are approved, the required easements will be prioritized by the RPRA, as described by the Area-wide Transportation Plan.

Whenever public lands are transferred to other Federal agencies, access across the transferred lands to adjacent public lands should be reserved in the transfer document.

Cadastral Survey

Cadastral survey is defined as the creation, reestablishment, marking, and definition of boundaries of the public lands. In addition, responsibility for the preparation and interpretation of the survey records lies with the BLM.

Cadastral surveys will continue to be conducted in support of resource management programs. Survey requirements and priorities will be determined on a yearly basis as a part of the annual budget process.

ADDITIONS AND CORRECTIONS

Table 2-3, Page 2-32

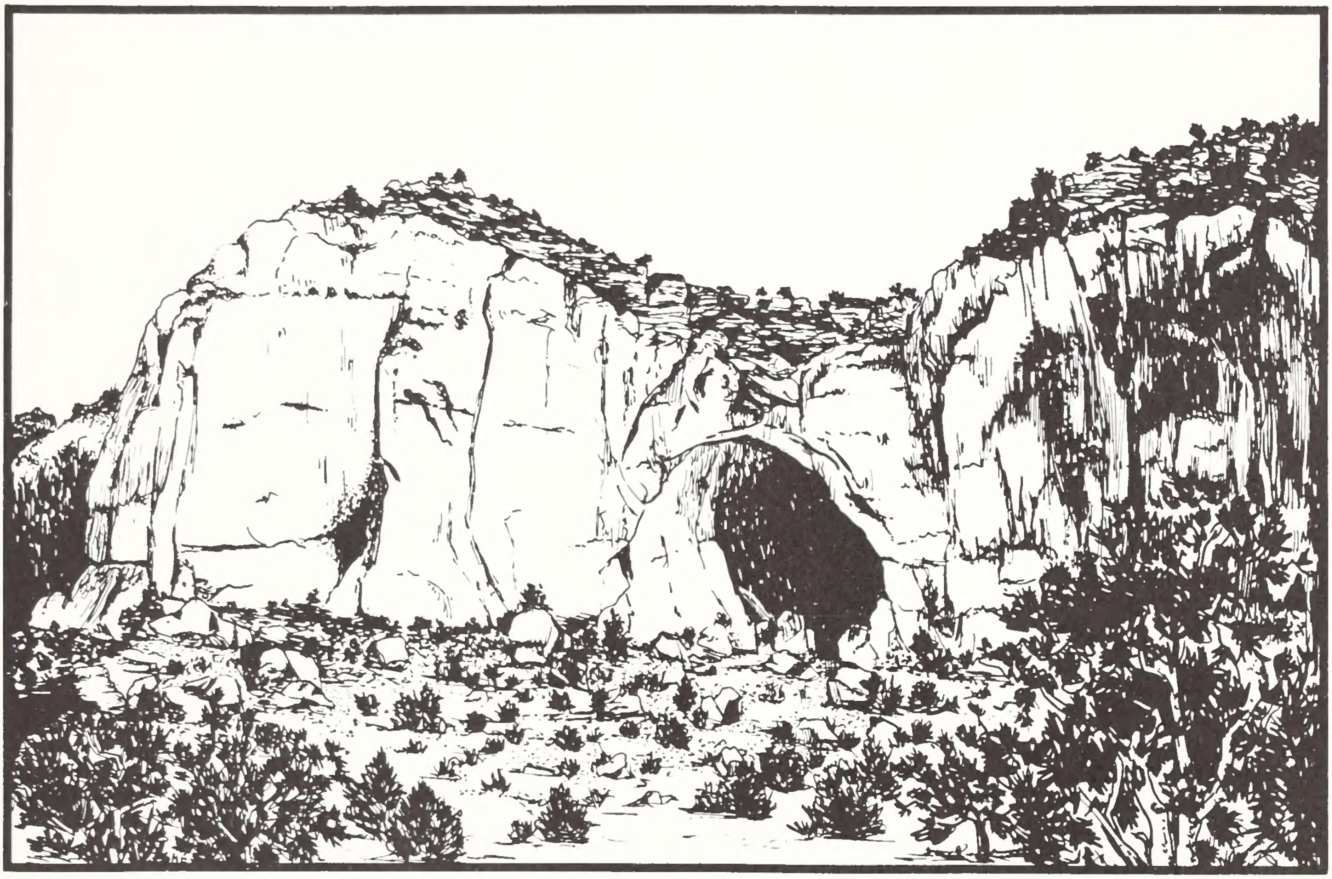
In the first line of Table 2-3 on page 2-32, the Management Goals for Area 18, Pronoun Cave Complex should read:

> Designate as ACEC/Research Natural Area to protect paleontological, recreational, and cultural values.

Assumptions, Page 2-47

The first sentence of Assumption 8 on page 2-47 should read:

> No Assumptions have been made on the outcome of the recommendations for the **twelve** Wilderness Study Areas or the El Malpais Wilderness Instant Study Area.



Chapter 3

AFFECTED ENVIRONMENT

CHAPTER 3

AFFECTED ENVIRONMENT

INTRODUCTION

Following analysis of the comments received on the Draft RMP/EIS, it was determined that the only section of Chapter 3 needing revision was "Soil and Water Resources." The original text, together with the additions, has been reprinted below.

The "Soil and Water Resources" section was revised in order to clarify resolution of the ORV designations issue. This section documents the long history of erosion problems and poor watershed conditions in the RPRA. It should be read in conjunction with the detailed ORV response in Chapter 5 which discusses the impacts associated with off-road motorized vehicle travel.

SOIL AND WATER RESOURCES

Soil

Most soil erosion problem areas in the RPRA lie within the Rio Puerco watershed. The Rio Puerco watershed has long been recognized as one of the highest sediment producing areas for its size in the United States. Water erosion in the deep, fine-textured alluvial soils and soft sedimentary rocks generally produces deep, straight-walled gullies. The less noticeable forces of sheet erosion have reduced or eliminated topsoil over large areas **since the turn of the century.** The Rio Puerco Grazing Environmental Statement (USDI, BLM 1978b) identified 34,254 acres in Critical Erosion Condition (1 to 5 tons/acre/year) and 6,149 acres in Severe Erosion Condition (greater than 5 tons/acre/year).

Approximately 50 percent of the East Socorro Grazing ES area in Valencia and Cibola Counties (Map 2-1 in the Draft) (USDI, BLM 1979a) was identified as being in the critical sediment yield class (1-3 acre feet/square mile/year). Erosion problem areas in the Divide Planning Unit (Map 2-1 in the Draft) (USDI, BLM 1983b) are few and are confined to individual drainages. Little is known about erosion conditions in Torrance County. Recent range inventories have noted severe gullying and sheet erosion on public lands in the southern portion of Sandoval County.

Three major erosion cycles have occurred along the Rio Puerco since the Pleistocene (Bryan 1941). The most recent cycle may have begun in the 1770's. Early Army reports indicate that headcuts and discontinuous gullies were developing west of Atrisco on the Rio Puerco by 1846 (Dortignac 1962). Headcutting and continuous entrenchment became very serious between 1870 and 1900 (Calkins 1937).

The Rio Puerco Valley has attracted human populations since prehistoric times. Early Spanish settlers irrigated large areas along the river using low diversion dams (Bryan 1928), or depended on floodwaters to irrigate the natural hay fields (Elliot 1979). Conflicts with Indians over land use as an expanding population moved from the Rio Grande Valley to the Rio Puerco, produced cycles of occupation and abandonment. There are indications that declining land resources, soil erosion, and drought, in addition to Navajo raiders, brought the abandonment of nine villages in the late 1770's (Dortignac 1962). The 1870's opened a period of extensive resettlement; however, the Rio Puerco was entrenched ten to thirty feet and irrigation proved difficult. Farm productivity declines paralleled the rise of stock raising as the environment of the Rio Puerco deteriorated. Stock raising started with very large numbers of sheep, but shifted to cattle because of environmental, social, and economic changes (Carlson 1969). Several schemes for colonizing and turning the Rio Puerco green using irrigation canals and dams met with failure. The last dam was built in 1938 and washed out in 1951.

Beginning in the 1930's, the Federal government began to invest funds through the Works Progress Administration (WPA) to rehabilitate rangeland and apply rangeland conservation measures in the Rio Puerco watershed. Following the WPA, the United States Department of Agriculture, through the Forest Service and the Soil Conservation Service, began to construct erosion control projects in the area (Burkham 1966).

In recognition of the seriousness of erosion problems in the western United

States, Congress passed the Bankhead-Jones Farm Tenant Act in 1937, authorizing Federal purchase of privately owned farmlands. This act authorized the Secretary of the Interior "to develop a program of land conservation and land utilization, including the retirement of lands which are submarginal or not primarily suitable for cultivation, in order thereby to correct maladjustments in land use, and thus assist in controlling soil erosion, reforestation, preserving natural resources, mitigating floods, preventing impairment of dams and reservoirs, conserving surface and subsurface moisture, protecting the watersheds of navigable streams, and protecting the public lands, health, safety, and welfare." Because of the extremely poor condition of the Rio Puerco watershed, a large portion, 187,000 acres or 48 percent, of the lands in the Rio Puerco Grazing ES area were acquired under this Act or similar land authorizations.

In cooperation with the BLM, the U.S. Geological Survey, and the USDA Forest Service Rocky Mountain Forest and Range Experiment Station participated in a ten year (1951-1960) study of hydrology, climate, and the effects of land management practices. These studies have provided the basis for range and watershed rehabilitation practices up to the present. Additional studies on specific problems have been funded since the late 1970's.

In the late 1950's, all of the public land now covered by the Rio Puerco Grazing ES (USDI, BLM 1978b) were consolidated under the administrative responsibility of the BLM. In 1962, in conjunction with the "frail lands" program, the BLM approved the Rio Puerco Project to reduce erosion and sediment yield from the Rio Puerco. The Rio Puerco was targeted as one of the priority areas in the West for reduction of erosion. It was estimated that seven years and $1,116,300 would be needed to implement the rehabilitation plan proposed for this project. This program included hundreds of retention dams, reservoirs, dikes and diversion structures, and thousands of acres of contour furrowing, brush removal, chainings, and reseedings.

In 1972, the Project was evaluated and a determination was made that grazing systems (Allotment Management Plans) would be given highest priority among watershed management tools, beginning the shift from watershed stabilization projects to grazing management facilitating projects, and influencing the watershed management proposals contained in the Rio Puerco Watershed Management Plan (USDI, BLM 1974b), the Rio Puerco Grazing ES (USDI, BLM 1978b), and the East Socorro Grazing ES (USDI, BLM 1979a).

The large number of erosion control structures built during the 1960's pose several problems. Many of these dams have silted in and nearly all require some degree of maintenance. Two recent surveys show that the drawdown pipes on many dams have been deliberately plugged, presumably to increase livestock water. The number of dams washing out increases each year, adding more sediment to the Rio Grande. It is clear from the history of the Rio Puerco that this area is highly erosive and is in poor condition.

Encino Dam Number 49 above Johnson's Trading Post is the only structure known at this time to threaten life and property in case of dam failure. An Emergency Action Plan for Encino Dam Number 49, directing notification, evacuation, and preventive measures, has been implemented.

Soil survey information for the entire Rio Puerco is available, although not all surveys have been published and some are scheduled for updating. Soil surveys generally cover entire counties of the RPRA except in the northwest section of Sandoval County where several small surveys were completed specifically for BLM planning purposes. Older soil surveys (six to twelve years old) will continue to be updated to provide current data.

Water

The Rio Puerco RMP area lies within four river basins: the Rio Grande, San Juan, Little Colorado, and Pecos. The Rio Grande and its tributary, the Rio Puerco, drain most of the area. The North Plains area in central Cibola County is a closed basin. A small area in Sandoval County drains into the San Juan Basin. The western part of Cibola County drains into the Little Colorado Basin. Most of Torrance County is a closed basin except for the east side which lies in the Pecos River Basin.

Surface water is relatively scarce in the area. Most channels flow only during or after localized, high intensity rainstorms. Large storms occasionally generate run-off in all channels for several days. A few tributaries at high elevations flow intermittently during snowmelt. Stream flows vary widely from year to year and are high in total dissolved solids and sediment.

The total amount of groundwater within the area is unknown. Livestock and domestic water facilities continue to be developed. Economics is usually the deciding factor in groundwater development. Quality of groundwater varies greatly, ranging from good to extremely saline. Nearly all waters can be used by livestock.

Average annual water yields from most of the area fall between 0.1 and 0.5 inches per unit area. The gaging station records on the Rio Puerco above Guadalupe show a low winter flow and two peak periods of summer flow, April-May and August. The average discharge at this point is over 10,000 acre feet per year. A maximum daily discharge of nearly 7000 cubic feet per second occurred in 1967. Most stations on the Rio Puerco show no flows for many days. Station records below the confluence of Arroyo Chico have one peak period, August. The maximum discharge from Arroyo Chico of over 15,200 cubic feet per second occurred in 1972. Within the Rio Puerco Resource Area, over 70 percent of the average annual stream flow generally occurs in July, August, and September. During this rainy season the channels are alternately flooded and nearly dry. From water years 1948 to 1980, the total annual discharge on the Rio Puerco at Bernardo ranged from 2045 cubic feet per second in 1978 to 43,345 cubic feet per second in 1957.

Sediment yields reported in the San Luis Watershed Study, 1967 to 1971 (Aldon and Garcia 1973), declined from 0.77 tons per acre per year to 0.22 tons per acre per year. The decline was the result of increased plant size and litter production on alluvial flood plains. Despite this potential for drastic reductions in erosion and sediment, the Rio Puerco remains the major contributor of sediment to the Rio Grande above Elephant Butte Reservoir. From water years 1948 to 1980, the total annual suspended sediment load discharged at Bernardo ranged from a low of 478,526 tons in 1978 to a high of 18,315,560 tons in 1955. The Rio Puerco regularly contributes about 64 percent of the average suspended sediment load passing San Acacia.

The Bureau of Reclamation has spent approximately eight million dollars over the last three years on sediment removal and maintenance of the conveyance channel between San Acacia and Elephant Butte Reservoir. Another eight million dollars will be spent over the next five years in addition to two million dollars for work in the Rio Grande channel (Bureau of Reclamation, personal communication 1985). The Bureau of Reclamation is only one of several agencies dealing with sediment from the Rio Puerco.

ADDITIONS AND CORRECTIONS

Coal, Page 3-3

The last sentence in the first column on page 3-3 should be deleted.

The word "unleased" should be deleted in the second sentence of the third paragraph in the second column on page 3-3. The third sentence in this paragraph should read:

> The tract contains 16.5 million tons of mineable reserves of unleased Federal coal, with a tract total of 18.3 million tons.

The fourth sentence of the last paragraph on page 3-3 should read:

> With a recoverable reserve tonnage of 62.9 million tons of Federal coal, a mine with a production rate of 1.6 million tons per year would have a projected mine life of 39 years.

Coal, Page 3-4

The second and third sentences of the first paragraph on page 3-4 should read:

> The Johnson Trading Post Tract was recommended for leasing under the target and high alternatives but was not recommended under the minimum surface owner or bypass alternatives. Subsequent to the original tract delineation, drilling under a coal exploration license has led to the conclusion that there is little if any commercial coal under the Chico Wash South Tract and that the area presently has minimal coal development potential.

This sentence should be added in the same paragraph:

> The analysis of the Chico Wash South Tract in the high alternative notes

> that the tract might not be recommended for further consideration for coal leaisng due to lack of sufficient cultural resource inventory data to analyze potential impacts.

Grazing Management, Page 3-12

In the first sentence of the section entitled "Grazing Management" on page 3-12, 215 should be changed to 214.

Recreation, Page 3-19

The first sentence of the first full paragraph on page 3-19 should read:

> The recreational opportunities available in the RPRA are predominantly undeveloped in nature and take place in a low elevation semi-arid setting.

The fourth full paragraph on page 3-19 should end with "twelve Wilderness Study Areas."

Population, Page 3-22

In the first sentence of the section entitled "Population" on page 3-22, 523,565 should be changed to 523,569.

Employment and Income, Page 3-22

In the second sentence of the section entitled "Employment and Income" on page 3-22, 54.4 percent should be changaed to 57.4 percent.

Ranch Budgets, Page 3-22

In the first sentence of the section entitled "Ranch Budgets" on page 3-22, 205 should be changed to 214. In the second sentence, eighty-four should be changed to ninety-two.

In the first sentence of the second paragraph of the same section, sixty-eight should be changed to seventy-six.

Table 3-7, Page 3-24

All of the column headings on page 3-24 should be shifted one column to the right.

The figure for "Change 1970 to 1980" under "Transportation, Communication, and Other Public Utilities Employment" (fifth column, Valencia County) on page 3-24 should be changed from 648 to 548. The "Percent Change" in the same column should be changed from 55.5 to 47.0. The "Percent Change" in the sixth column (5-County Total) should be changed from 46.0 to 85.2.

Table 3-9, Page 3-27

The fourth line of Table 3-9 on page 3-27 should read:

> Average Herd Size (Brood Cows) 26 210

Chapter 4

ENVIRONMENTAL CONSEQUENCES

CHAPTER 4

ENVIRONMENTAL CONSEQUENCES

INTRODUCTION

This chapter analyzes the impacts which would result from implementing the Proposed Plan. The Proposed Plan would protect important environmental values and sensitive resources while allowing development of resources.

The Plan provides general guidance only; following selection of an RMP, activity plans with environmental analyses will be developed to implement the RMP and provide specific guidance for management of affected areas. The emphasis of this chapter is on the general resource allocation issues rather than site-specific impacts.

There would be no impacts to air quality under the Proposed Plan. The principal impact of the coal leasing suitability assessment determination would be on the coal resource itself since a recommendation of lands suitable for further consideration for coal leasing does not commit the BLM to mining coal. That commitment would result from leasing, which cannot occur until after the preparation of a site-specific environmental analysis done in conjunction with activity planning. The delineation of a "coal study area" in this RMP will have no impact on any other resource or commodity. Therefore, the impacts of the coal leasing suitability assessment issue are discussed only in the Geology, Energy, and Minerals section of this chapter.

The analysis of unavoidable adverse impacts, short-term versus long-term productivity, and irreversible and irretrievable impacts is discussed in the impact analysis for each resource rather than under a separate heading.

PROPOSED PLAN

Geology, Energy, and Minerals

The Proposed Plan is designed to protect important environmental values and sensitive resources while allowing the development of mineral resources.

The issue prescriptions for the fuelwood supply and vegetative uses issues would have no impact on mineral resource development. The remaining issue prescriptions discussed below would have significant short- and long-term impacts on energy and mineral development.

The identification of 22 Special Management Areas totalling 426,636 acres would result in restrictions on leasable, saleable, and locatable mineral development (see Tables 4-2 and 4-3 in the Draft). Approximately 4,558 acres of the RPRA would be withdrawn from fluid mineral leasing. An additional 1,946 acres would be stipulated for no surface occupancy, and 61,380 acres would have seasonal or other restrictions placed on development. The short- and long-term impacts of these actions would be to reduce the land available for fluid mineral development and to increase the expense of development on the affected lands.

Mineral material sales probably would not be compatible with SMA management objectives. Therefore, 267,440 acres would be unavailable for the disposal of industrial mineral commodities except under exceptional circumstances. The proposal to withdraw 12,438 acres from mineral entry would decrease the locatable mineral land base only slightly. The regulatory burden on mining claimants who have staked or may stake claims on the 50,877 acres within ACEC's would increase. Development of claims within ACEC's requires the filing of plans of operation and the preparation of environmental assessments (43 CFR 3809).

Motorized vehicle restrictions would not affect licensed users except for the requirement that mining claimants file a plan of operations in areas closed to motorized vehicle use. Additionally, the closures for SMA's would probably be incompatible with mineral material sales or other mineral resource development involving surface disturbance. Closure of road segments could create access problems for drillers and miners and could result in added development expense.

Because the planning criteria for this RMP limit the creation of additional split estate acreage (see Chapter 1 in the Draft), only those lands with little or no mineral potential would be offered for exchange or disposal in fee simple title. Overriding public interest could create exceptions to this criterion (see Appendix G in the Draft). Any encumbering leases and contracts would be managed by the BLM until their expiration.

The management prescription for the rights-of-way corridors issue under this Plan involves the identification of several corridors and three rights-of-way development windows (see Pocket Map B). The balanced management emphasis dictates that the lands included within the corridors and windows be reserved for right-of-way construction and protected from conflicting mineral development. The most restrictive criteria would apply to the development windows where, because of topography and land ownership patterns, conflicts with rights-of-way placement must be kept to a minimum.

Fluid mineral leasing would continue to be permitted within the designated corridors but would not be permitted within the rights-of-way windows. The prohibition of fluid mineral leasing within the windows is required due to relatively small window size and critical geographic location. The decision not to lease within the windows would remove about 17,620 acres of land with high to moderate oil and gas potential from the fluid minerals leasing base. A no surface occupancy stipulation was considered for these areas, but because slant drilling is generally uneconomical at depths of less than 5,000 feet, this stipulation was determined not to be feasible.

Under the Proposed Plan, only those lands which have been determined to be both suitable and acceptable for coal development following application of the surface owner consultation, multiple use, and unsuitability criteria screens (see Appendix E in the Draft) would be recommended for further consideration for leasing. In the area of maximum near-future coal development potential, new rights-of-way would be located so as to minimize impacts to the coal resource. Under this management prescription, the majority of the coal resources in the area of maximum development potential, about 8,020 acres, would be considered acceptable for further consideration for leasing. Only the coal underlying the established de facto corridor would be considered unacceptable.

The designation of the rights-of-way corridor would be used to define the controlling date for the establishment of valid existing rights. Any coal leases issued subsequent to approval of this RMP would be subject to special stipulations. The stipulations would require the coal lease holder to be financially responsible for any relocation of rights-of-way done to avoid the creation of bypass coal.

Locatable mineral development would not be impacted by rights-of-way corridor and window designation.

Under this Plan, about 30 million tons of coal would be made unavailable for further leasing consideration and would not be mined unless a plan amendment were prepared.

Mineral material sales within the rights-of-way corridors and windows would be permitted only if the sales did not interfere with future right-of-way construction. Sale applications would be handled on a case-by-case basis.

The Proposed Plan proposes management protection for two important geological resources located within the boundaries of the Ojito SMA, the San Ysidro anticline and the Las Milpas Gas Storage Facility. The area of the San Ysidro anticline is frequently used for geologic instruction. It would be protected from non-discretionary mineral development through its inclusion in an ACEC, with the resulting requirement under the surface management regulations for the filing of a plan of operation and the preparation of an environmental analysis under the surface management regulations prior to surface disturbance. In addition, lease development activities would be closely monitored and mineral material sales would be prohibited under all but exceptional circumstances.

The underground Las Milpas Gas Storage Facility represents a potential geological hazard and would receive added protection through a locatable mineral withdrawal. No mining claims would be permitted on 7,480 acres of this area. As is the case with the San Ysidro anticline, leasing would be permitted, but lease development activities would be intensely monitored. No mineral material sales would be authorized from the storage facility area.

Summary

In the short term, significant acreage would be determined to be unacceptable for further consideration for coal leasing and the acreage encumbered by no surface occupancy and other special stipulations on leases would increase dramatically. Additionally, a total of 267,440 acres of the RPRA's mineral lands base would be removed from consideration for mineral material sales.

In the area of maximum near-future coal development potential, new rights-of-way would be located so as to minimize impacts to the coal resources. The majority of the coal resources in this area, about 8020 acres, would be considered acceptable for further consideration for leasing. The impact of this management prescription upon mineral resource development would be negative and would result in decreased mineral resource availability and increased development expense. Additionally, substantial acreage would be withdrawn from mineral location, and increased regulatory burden would be placed on claimants who locate within ACEC's.

Universities would continue to have assured access to a unique, local geological study area and the operators of the Las Milpas Gas Storage Facility would receive an added measure of protection from unauthorized penetration of the gas reservoir.

Paleontological Resources

No significant impacts would result from management prescriptions proposed for the vegetative uses, fuelwood supply, and rights-of-way corridors issues.

This Plan places primary emphasis on maintaining or improving the condition of important paleontological values through the identification of the Torrejon Fossil Fauna SMA and Elk Springs SMA which would protect the Juana Lopez Member (see Appendix C, SMA's 1 and 14). Because the detrimental effects of uncontrolled motorized vehicle use and unrestricted mineral development would largely be mitigated under this management prescription, little or no negative impact to the RPRA's significant paleontological resources is anticipated.

Substantial positive resource impacts would be derived from protection afforded by the various types of special management designations. ACEC designation would require the filing of a plan of operations under the surface management regulations (43 CFR 3809). Locatable mineral development would be allowed to continue in the ACEC's, but the requirement for an environmental analysis would ensure compatibility with protective resource management. Mineral withdrawal is proposed for those areas where no form of mineral development is considered to be safe or compatible. Withdrawal proposed for paleontological values associated with the Juana Lopez Member is limited to a total of forty acres. The protection recommended for these significant areas would ensure that important paleontological benchmarks would remain undisturbed and available for future scientific study. Lands containing important and significant paleontological resources would not be offered for sale or exchange under this proposal. With regard to the operation of the disposal criteria under this Plan (see Chapter 1 in the Draft), paleontological resources would receive the same consideration as cultural resources.

Soil and Water Resources

No significant impacts would result from resolution of the land ownership adjustments issue.

Under the Proposed Plan soil and watershed protection would be enhanced by placing 426,480 acres in SMA's, and by designating the majority of the RPRA as "limited" for motorized vehicle use. In addition, 90,993 acres and 16 miles of road would be closed to motor vehicle use.

In addition, it is estimated that short-term grazing reductions on 32,233 acres would be proposed. Surface disturbance would increase as grazing returns to current levels over the long term; however, improved grazing management would decrease erosion and sediment production.

Surface disturbance would occur on forty-one acres annually from fuelwood activities. The continuous loss of soil to wind and water erosion constitutes an irretrievable commitment.

Overall, the Proposed Plan would benefit the soil and water resources in both the short and the long term. A reduction in erosion and sediment production would be expected as more land is protected from surface disturbing activities in Special Management Areas. Including the three Rio Puerco Hydrology Study watersheds in the Pelon Watershed, San Luis Mesa Raptor Area, and Ojito SMA's (see Appendix C) would ensure uninterrupted data collection.

In the short term, no significant impacts would be expected from motorized vehicle restrictions. In the long term, controlling and limiting motorized vehicle use would reduce erosion resulting from the creation of new roads and trails. Any roads closed would be stabilized to prevent future erosion problems. Increased erosion would occur in areas where ORV, equestrian, and foot trails are designated, and use increases.

In the short term, changes in grazing management and use would slightly reduce erosion and sediment yields. However, in the long term, adjustments in grazing would allow improvement in vegetative cover and would result in decreased runoff and erosion.

Short-term increases in erosion and sediment production would occur as a result of fuelwood harvest and transmission line placement in rights-of-way corridors and windows. Permit stipulations for mitigation of impacts and rehabilitation of disturbed areas would provide long-term erosion control.

Range Resources

There would be no impacts under this Plan from the special management areas issue.

The motorized vehicle restrictions proposed under this Plan would provide protection for the majority of public land in the RPRA from possible declines in vegetative vigor, vegetative production, and ecological condition.

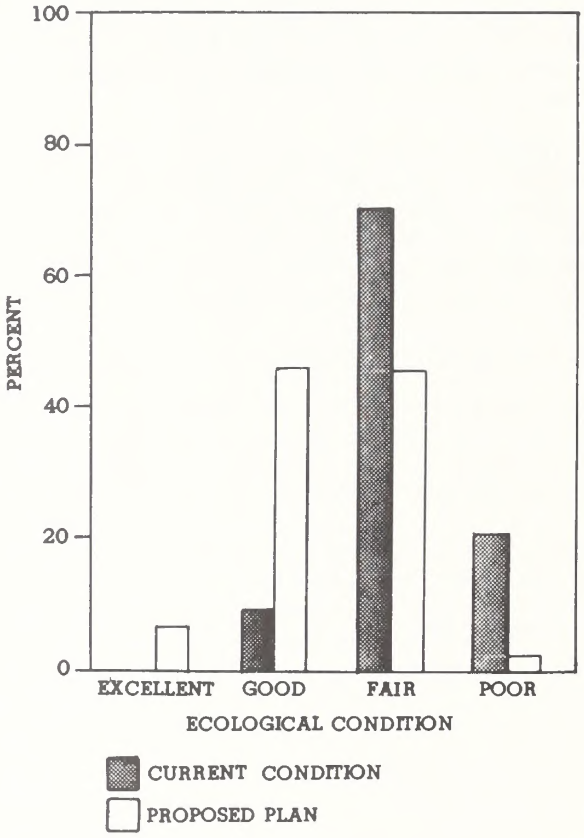
Under this Plan, it is estimated that a reduction of 850 AUM's would be required in the short term for six "I" allotments. These estimated reductions would be at least 15 percent of the current allowable livestock grazing use for each of these allotments. These reductions in livestock grazing would be phased in over a five year period to decrease the adverse impacts on the livestock operations by allowing the allottees to gradually decrease their herds and/or locate alternate pasture. No long-term increases in AUM's would be proposed.

Increased vegetative production and resolution of resource conflicts on all "I" allotments would occur as a result of improved grazing management and installation of rangeland improvements. In the long term, an estimated increase of 850 AUM's for livestock use would reverse the short-term reductions of AUM's on the six "I" allotments. In the short term, improved vigor of preferred livestock forage would be expected on six "I" allotments, with no significant changes in ecological condition expected on the "M" and "C" allotments.

In the long term, improvements in ecological condition would occur on the "I" and "M" allotments. No changes in ecological condition would be expected on the "C" allotments. Figure 4-3 illustrates the expected long-term changes in ecological condition.

FIGURE 4-3

LONG-TERM CHANGES IN ECOLOGICAL CONDITION



Those allottees on the public lands identified for exchange, sale, or Recreation and Public Purposes Act lease would lose their grazing privileges if the exchanges, sales, or leases were consummated. Generally, the impacts on these allottees would be slight since the public lands constitute only a small part of their total livestock operations. If the lands are offered for exchange or sale to other land management agencies, the impacts would be mitigated if these agencies continued to grant livestock grazing use to the allottees.

Forty-one acres of fuelwood would be available for harvest. In the short term, livestock forage production would decrease as a result of surface disturbance associated with fuelwood harvest. In the long term, increased production of livestock forage would result from fuelwood harvest as a result of decreased competition. However, no significant short- or long-term effect on the range resources and no changes in livestock grazing use would be authorized as a result.

Designation of the rights-of-way corridors and windows proposed under this Plan could provide protection from surface disturbing activities associated with right-of-way development for the large portion of the RPRA's range resources outside of the designated corridors. However, short-term impacts to the range resource would still result from right-of-way developments placed in the corridors and windows, although these impacts would not be of a sufficient magnitude to require reductions in livestock grazing use. In the long term, the impacts to the range resource would be mitigated by the revegetation requirements associated with the granting of rights-of-way.

Summary

It is estimated that a reduction of 850 AUM's would be required in the short term for six "I" allotments. In the long term, the reduced AUM's would be restored, reversing the impacts of those reductions on the livestock operations of the allottees. In the short term, vigor of preferred livestock forage would improve on the six "I" allotments. In the long term, resolution of resource conflicts would be anticipated on the "I" category allotments. No irretrievable or irreversible impacts on the range resources would result.

Wildlife

Wildlife Habitat

The management prescriptions and protection measures outlined for SMA's in Appendix C would specifically benefit wildlife habitat on 76,321 acres of the Ignacio Chavez, Elk Springs, Tent Rocks, San Luis Mesa Raptor Area, and Jones Canyon SMA's. Wildlife habitat in the 17 other SMA's (350,159 acres) would also receive increased protection as a result of proposed management changes in these areas.

The restrictions on motorized vehicle use would protect wildlife from harrassment and habitat degradation in the long term throughout most of the RPRA.

It is estimated that ecological condition would improve in the long term on seven of the sixteen Section 3 grazing allotments. Habitat conditions would not change in the Section 15 areas. Where there is improvement in ecological condition, forage and cover availability would increase. Trampling of ground nests would be reduced somewhat. See Table 4-1 in the Draft for the level of wildlife-livestock conflicts anticipated. No significant changes in wildlife-livestock conflicts would occur in the short term.

Wildlife habitat now in private or State ownership could be brought under public administration through exchanges. The lands given up to acquire these lands would generally be of lesser quality for wildlife habitat since scattered tracts with limited wildlife management potential would be offered for exchange.

Fuelwood sales would be designed to correspond to long-term habitat improvement objectives by creating small openings and through selective cuts to increase forage and habitat diversity on 17,300 acres of woodlands in the Ignacio Chavez SMA. There would be a short-term increase in access and disturbance to wildlife during the fuelwood removal. Some illegal cutting might continue after the sale period, causing loss of cover and disturbance to wildlife. Ponderosa pine habitat might improve on a limited scale. In addition, an estimated 9,320 acres of pinyon-juniper woodland would be open for fuelwood harvest. Authorized harvesting at a maximum rate of forty-one acres per year would cause short-term disturbance to wildlife during cutting operations. In the Chiuilla Mesa and Mesa Portales areas, past chainings and fuelwood sales have reduced pinyon-juniper stands to a point where any further loss would significantly affect big game and woodland-dwelling bird populations. In the long term, edge-effect and forage would be increased as a result of woodlands management.

Assuming that the same number of rights-of-way with the same amount of surface disturbance would occur whether or not corridors are established, wildlife would benefit from corridor establishment since rights-of-way would be channeled through lesser quality habitat rather than through high quality areas such as the Ignacio Chavez Grant. Surface disturbance would be concentrated in the rights-of-way corridors and windows. While this would initially cause disturbance to wildlife and a loss of forage, as ecological succession progressed, the disturbed surface would go through a forb stage which would benefit some wildlife species, eventually returning to the original vegetation community. Vehicular access would probably increase in the corridors, decreasing their value as wildlife habitat.

Summary

The impacts of disturbance from fuelwood cutting and rights-of-way construction are short term. The remaining impacts summarized below are long term. SMA's would provide additional protection to wildlife habitat on 426,480 acres. Restrictions on motorized vehicle use would benefit wildlife habitat. Improved ecological condition would benefit wildlife on seven allotments. Conditions would not change on the remaining grazing allotments. Fuelwood sales would increase forage and habitat diversity. Rights-of-way corridors would concentrate impacts in the corridors and away from better quality habitat areas. Land exchanges could trade less valuable for more valuable habitat, an irreversible and irretrievable positive impact.

Threatened, Endangered, and Rare Species

No significant impacts would result from the land ownership adjustments, fuelwood supply, or rights-of-way corridors issues.

Special Management Areas with specific goals for protecting rare plants would include 21,317 acres in the Cabezon Peak, Ojito, and Ball Ranch SMA's. Rare plants would be protected if they occur in SMA's identified for other resources. The protection for habitat on all SMA's would benefit bald eagles, peregrine falcons, and State-listed gray vireos, when present. Generally, SMA's would provide short- and long-term protection to threatened, endangered, and rare species.

Threatened and endangered species and rare plants would benefit from the motorized vehicle restrictions as well as from improved ecological condition resulting from livestock management. Habitat conditions would remain the same on nine Section 3 allotments and on all Section 15 allotments.

As it is not feasible to implement grazing management on BLM tracts in Torrance County, any impacts grazing may have on the State-listed McCown's longspur are not addressed.

Woodland Resources

There would be no impacts under this Plan for the following issues: vegetative uses, land ownership adjustments, and rights-of-way corridors.

The identification of SMA's containing woodland resources would result in control of unauthorized fuelwood harvest on 28,170 acres of woodlands, since more patrol and surveillance would be given to the area. This Plan would prevent the initiation of any silvicultural practices on 9,170 acres directed at enhancing or protecting fuelwood supply in these SMA's for the life of the plan. In addition, forty acres per year would be unavailable for fuelwood harvest in the short- and long-term. On the Ignacio Chavez SMA, 1,700 acres would be available for silvicultural practices aimed at improving the fuelwood supply. An additional 17,300 acres of woodlands in the Ignacio Chavez SMA would receive silvicultural practices to benefit other resources, producing some fuelwood that would be available to the public. These impacts would be felt in the short and the long term, with the exception that, in the long term, not providing for any kind of silvicultural treatment to 9,170 acres could have a tendency to shift the woodlands toward shrub-grassland after many decades.

In the short term, ORV designations would not significantly impact woodland resources. In the long term, such designations would control the expansion of roads and trails, which would aid in reducing access to unauthorized fuelwood harvesting areas.

Under the Proposed Plan, 9,320 acres of woodlands (7,620 acres outside proposed SMA's and 1,700 in the proposed Ignacio Chavez SMA) would receive silvicultural treatment to benefit the fuelwood supply, making about 41 acres a year available for fuelwood harvest. Combined with the fuelwood that would be made available from the 17,300 acres that could receive treatment to benefit other resources (wildlife, range, or ponderosa pine management projects), the supply of authorized fuelwood would increase, and result in an expected decline in trespass cutting. These would be both short- and long-term impacts to the woodland resources. In the long term, 9,170 acres would not receive any silvicultural treatment, while a total of 26,620 acres would receive some form of treatment. As a result, the treated acres would be expected to have healthier sustaining stands of pinyon-juniper, while the untreated stands could experience hindered regeneration and a possible start of a shift to a shrub-grassland vegetative community.

Recreation

Identifying twenty-two SMA's would significantly enhance the recreation opportunities in the RPRA. About 66,621 acres of primitive recreation opportunity would be protected, as would 128,389 acres of semi-primitive non-motorized opportunity, 163,359 acres of semi-primitive motorized opportunity, and 67,880 acres of roaded natural opportunity. About 23,587 additional acres of primitive recreation opportunity would be available in the Rio Puerco Grazing ES area. The quality of the recreation opportunities would be enhanced by several management actions proposed for the SMA's (see Table 2-3 in the Draft and Appendix C). Many of the proposed actions, including managing to protect scenic values, closure to motorized vehicle activity, limiting motorized vehicle activity to existing roads and trails, mineral withdrawal, allowing no surface occupancy, closure to mineral leasing, and protection of wildlife habitat, rare plants, and cultural and paleontologic values, would encourage the maintenance of these special recreation opportunities as they currently exist. Identification of SMA's followed by site-specific activity plans would define the scope and priorities for management of recreation resources, resulting in visitor services and a level of protection for these recreation resources which do not currently exist. Identification of the 1870's Wagon Road Trail for equestrian and foot travel and defining a treadway for the Continental Divide National Scenic Trail, would help meet both national and State trail objectives.

Totally "open" motorized vehicle recreation opportunity would be greatly reduced in the RPRA. About 15,574 acres in SMA's and the Bluewater ACEC would be "closed" and motorized vehicles would be limited in much of the rest of the RPRA to existing roads, trails, and special use areas (see Map 2-14 in the Draft). In the long term, this would result in a moderate impact to those recreationists preferring a totally "open" ORV opportunity. There would be, however, 1500 miles of routes available for ORV recreation ranging from primitive to graded to paved routes. In addition, large expanses of the RPRA are unsuitable for cross-country travel because of rugged terrain.

The ORV "closed" and "limited" designations would significantly enhance the preservation of primitive, semi-primitive non-motorized, and semi-primitive motorized recreation opportunity. The designation of a trials use area, dune buggy competitive use area, and 124 miles of ORV recreation trail system would partially mitigate the impact of eliminating all "open" motorized vehicle recreational opportunity in the RPRA. The closure of BLM Inventory Road 15-1-18 in the Ojito SMA (see Appendix C) would necessitate the re-routing of a race course often used by the annual "Oh-My-God-100" motor-cross race. One alternate site has already been utilized for this race. The race could be accommodated elsewhere. Closure of roads 5-5-15, 5-5-17, and 16-5-23 (except to authorized users) in the Ignacio Chavez SMA (see Appendix C) would allow two contiguous semi-primitive non-motorized recreation areas to be combined and managed as a primitive recreation opportunity to help meet the expressed demand for this type of opportunity (Appendix I in the Draft).

Improving ecological condition for the enhancement of wildlife habitat and improved watershed resources would enhance the recreation opportunities in the long term on 32,233 acres in the vegetative uses issue area by protecting and enhancing the natural setting in which all types of recreation take place.

Public lands identified for land ownership adjustment could be exchanged for lands identified as suitable for acquisition in the Ladron and Divide MFP's and the SMA's, contributing significantly to more effective management of recreation resources.

Selective cutting of fuelwood in the Ignacio Chavez SMA for the benefit of wildlife values would improve recreation opportunities associated with wildlife. Fuelwood harvest from semi-primitive non-motorized areas in support of woodlands management would tend to shift the recreation opportunities to those which most often occur in roaded natural settings. The greater the amount of fuelwood cutting, the greater the shift from the more primitive to the roaded natural opportunity because of an increased road network.

The rights-of-way corridors and windows proposed for this Plan would have little impact on the recreation resource. Right-of-way development would be encouraged through areas most appropriate to right-of-way needs, thus reducing impacts to the remainder of the RPRA. Some protection of sensitive recreation resources, such as those located in the SMA's, would be an indirect benefit.

Summary

Overall, this Plan would have a beneficial impact on recreation opportunities in the RPRA. Both short-term and long-term beneficial impacts would accrue and would result in visitor services and a level of protection for recreation opportunities which do not currently exist. The motorized vehicle opportunities provided by a trials use area, dune buggy competitive area, and ORV trail system would help mitigate the impact of reducing totally "open" motorized vehicle opportunity in the RPRA, as well as reduce conflicts between motorized and non-motorized recreation needs. This Plan provides for the enhancement of a full spectrum of recreational opportunity, from primitive to more highly developed roaded natural opportunities (see Appendix I in the Draft).

Visual Resources

Nine of the twenty-two SMA's which would be established contain specific management objectives for the maintenance of the existing high quality visual resources. These areas are Canon Jarido, Jones Canyon, Cabezon Peak, Ignacio Chavez, Elk Springs, Tent Rocks, Ojito, El Malpais, and Petaca Pinta. About 167,669 acres of Scenic Quality A and 235,830 acres of Scenic Quality B would be protected (see Appendix J in the Draft). Site-specific activity plans to be completed at a later date would define the scope and priorities for the visual resources. Adequate protection of sensitive visual resources in these nine SMA's would be assured under this Plan.

The curtailment of illegal routes and the ancillary activities that often accompany them would help in reducing impacts to visual resources.

Improving ecological conditions for the enhancement of wildlife habitat and improved watershed resources would generally enhance the visual resource. The elements of texture and color would most likely be improved.

The exchange of public lands identified as suitable for land ownership adjustment for those lands identified in the Ladron and Divide MFP's and the proposed SMA's as suitable for acquisition would significantly assist in more effective management of visual resources by providing control of surface modification on contiguous lands.

There would be little impact to visual resources from selective cutting for fuelwood. The impacts of fuelwood harvest from forty-one acres would be assessed annually on a site-specific basis.

Although the impacts associated with right-of-way development would be assessed on a site-specific basis, the cumulative impacts to visual resources would be less if transmission lines were placed through the corridors and windows than if they were placed randomly through the issue area.

Cultural Resources

There would be no impacts under the vegetative uses and fuelwood supply issues for this Plan.

High density, high value cultural resources located within the identified SMA's would receive special management attention and emphasis.

Direct impacts to cultural resources from motorized vehicle use would be slightly reduced and indirect impacts would be substantially reduced in the long term by closing some areas to motorized vehicle use and generally limiting vehicle use to existing roads and trails. This would help to limit access to cultural resource sites.

The advantage of acquiring non-BLM lands containing high value cultural resources through land exchanges or other means could be realized. BLM lands having high density, high value cultural resources would be retained and not exchanged unless the adverse effects of the exchange were mitigated.

Avoidance and/or mitigation of cultural resources within specific rights-of-way corridors and windows could be addressed in single projects or staged to preclude treatment on a case-by-case basis. The establishment of rights-of-way corridors would allow completion of inventory, evaluation, and mitigation of cultural resources within the corridor area independent of a particular project. Once these actions were completed no additional considerations for cultural resources would normally be necessary for future projects within the corridor.

Lands and Realty

There would be no impacts under this Plan for the following issues: ORV designation, vegetative uses, and fuelwood supply.

In implementing this Plan, the RPRA would be initiating a flexible program of land ownership adjustments. The extent and intensity of the impacts would depend upon the final acreage exchanged or sold.

Acquisition of approximately 8,879 acres of State and private surface located in SMA's would be authorized, representing about 14 percent of the total surface acreage of the SMA's. The impacts of acquiring non-public lands are summarized on Table 4-4. Other exchanges could be identified in the future to enhance management in the long term. In the long term, consolidation of the public lands would improve management efficiency and effectiveness in the SMA's and would have a significant positive impact. Exchanges would tend to balance the impacts of disposal with those of acquisition, a major benefit. By regulatory requirement, exchanges should result in a net increase in public values. Large-scale and rapid land ownership adjustments through exchanges with the State and other entities are unlikely. This should be considered a long-term program lasting the entire life of this RMP.

Adoption of the Proposed Plan would result in a more active public land sale program. Most of the small scattered tracts in the land ownership adjustments issue area have remained in public ownership because of physical characteristics such as steep slopes, location in playa lakes, and rock outcrops that reduce their value for agricultural use, and most of these tracts are located far from commercial or residential areas. It is therefore unlikely that even 25 percent of the public lands identified as potentially suitable for disposal would actually be sold. The general impacts of selling public lands are summarized on Table 4-5. Large-scale and rapid sales of public land in the issue area are highly unlikely. This should be considered a long-term program lasting the entire life of this RMP.

Sale often offers a simpler, quicker method of land ownership adjustment than exchange, but decreases the long-term potential for creating a more desirable land ownership pattern by depleting the land base available for future exchanges. This is considered a significant negative impact to the public.

Designation of the rights-of-way corridors and windows identified on Pocket Map B would facilitate the orderly placement of future transmission lines. Proposed Corridor I is located within the corridor analyzed in the New Mexico Generating Station EIS (USDI, BLM 1983c) (see Pocket Map B), which could simplify the environmental analysis of future transmission line placement because site-specific resource conflicts have already been identified in this EIS. To avoid the Cabezon and Ojito WSA's, the proposed corridor is narrower than the New Mexico Generating Station EIS corridor. In the long term, transmission lines generally would be constructed in defined corridors. Placement of transmission lines outside of corridors would occur only in unusual circumstances and would be handled on a case-by-case basis. Development that is incompatible with critical transmission line placement areas (windows) would be prevented.

In the area of maximum near-future coal development potential, new right-of-way developments would be located as close to the southwest edge of the corridor as possible. New rights-of-way would be situated as close to existing rights-of-way as is safe and technologically feasible. No significant impacts would be associated with filling the southwest part of the corridor adjacent to the coal area first. Placement of the transmission lines as close together as possible could result in increased development costs.

The special stipulations attached to rights-of-way granted in the area of overlap between the Ojito SMA and the Ojito East Window would be designed to protect SMA values. The application of these stipulations could result in impacts to transmission line placement. For example, transmission lines may have to be placed in

TABLE 4-4

IMPACTS OF ACQUIRING NON-PUBLIC LANDS

Positive	Negative
Improves resource values of existing public land.	Can displace existing authorized users if current use conflicts with management plans for the area.
Can provide improved public access to important resource values.	Substantial costs in processing cases.
Improves manageability of existing public land by eliminating private and State inholdings with potential for conflicting uses.	May adversely affect the tax base of one or more counties.
Creates more manageable land ownership patterns.	May sacrifice one or more private interests to benefit other public interests.
Improved manageability can decrease administrative costs.	

TABLE 4-5

IMPACTS OF SALE

Positive	Negative
Potential for placing land in a higher use such as agricultural, commercial, or residential.	Potential loss of resource values, primarily wildlife and cultural.
One time payment to U.S. Treasury.	Loss of future revenues from land use authorizations.
Decreased management costs for the BLM.	High cost of processing disposal.
Increase in local property tax revenues.	Loss of future exchange potential as disposable tracts are depleted.
Could relieve current user of user fees.	Loss of Payments in Lieu of Taxes.
Can provide additional land for residential development in urban areas.	Potential economic strains on person who currently uses land but cannot afford to purchase it.
Opportunity for ranchers to block up their holdings.	Possible additional encumbrance and development costs of mineral rights.

other than the most logical location to avoid impacts to Mound Springs and to minimize impacts to the San Ysidro anticline.

Social and Economic Conditions

Under the Proposed Plan twenty-two Special Management Areas would be established. The special management proposed would result in short-term, positive social impacts with no change in economic values. In the long term, impacts would be positive due to the preservation of social values and could be positive for economic values. For example, an area managed for recreation could have positive economic benefits resulting from increased tourism.

No economic impacts would be expected as a result of motorized vehicle restrictions. The RPRA has received a number of comments protesting any change in the current "open" ORV status. These individuals feel that limiting motorized vehicles to existing roads and trails would seriously restrict their recreation opportunities. In the long term, there would be more intensive motorized vehicle recreation use on the existing roads and trails, and more trails would become roads. This could eventually limit the off-road type of recreational experience. This Plan would provide for the issuance of special permits for group events, which could mitigate some ORV user objections to these restrictions. Limiting motorized vehicles to existing roads and trails would reduce the incidences of livestock harassment, vandalism, and trespass fuelwood cutting in the long term.

No changes are expected in employment or income resulting from livestock grazing since the total AUM's available after the estimated reductions would be greater than the average use for the past five years. Some of the individual operators would have reductions in the short term of as much as 20 percent. In the long term, however, reduced AUM's would be restored and some increases, up to 20 percent, would be allowed.

A value of approximately $100 per AUM has accrued to BLM permits in the real estate market. The average smaller operator's permit is valued at $31,900. The reductions estimated for this Plan would reduce this value to $28,200 or by 12 percent in the short term. In the long term there would be no change. The average current permit value for the larger operators is approximately $186,200. Short term changes would reduce the average permit value to $172,300 or by 7 percent. In the long term there would be no change.

The lands proposed for exchange under this Plan are small, scattered, and isolated tracts. The exchange of these lands could result in slight economic and social impacts.

Livestock grazing privileges could be lost on public lands exchanged, sold, or leased. However, since emphasis in this Plan is on exchange with the State, which would likely extend grazing leases to the present users, and since these small tracts are not critical parts of any grazing operations, the impacts would be negligible. State land grazing fees are considerably higher than BLM fees. However, since the land to be exchanged is a small part of a total livestock operation, this rate change would have a negligible impact. The grazing lessees would have to buy the lands offered for sale or make arrangements with the purchaser to ensure the continuation of their grazing operations.

The lands proposed for exchange could be used in exchanges to acquire non-public land in the SMA's, resulting in slight positive long-term social and economic impacts. Consolidating the lands in the proposed SMA's under public ownership would improve resource management and could result in a small increase in recreation and tourism in these areas.

Fuelwood prices would increase in the long term as a result of increased demands from the area's expanding population. Rising prices would have only a slight economic effect on the urban fuelwood user. However, the social and economic impacts on the local resident users in Cuba and the surrounding rural areas would be greater. These rural users would find it increasingly more difficult and expensive to obtain their traditional heating and cooking fuel.

Restriction of transmission lines to the rights-of-way corridors and windows proposed under this Plan could slightly increase development costs if the corridors did not provide the most direct and least expensive route. However, utilization of the corridors would reduce the requirements for extensive environmental analysis and would result in a decrease in development cost.

Summary

Special management for twenty-two areas with valued resources would bring positive short-term social impacts and should not result in changes in economic values. Long-term social and economic impacts would be positive, depending on the degree of public use of the Special Management Areas.

Motorized vehicle use would be restricted, but special-use areas would be available. Special-use permits would be issued for group events. No short- or long-term economic or social impacts would result.

It is estimated that a short-term decrease in allowable livestock grazing would be proposed for four small operators and two large operators. Considering the twelve operators collectively, no significant impacts would result from the implementation of these estimated reductions. However, implementation of these reductions would have a significant short-term impact on six operators. For two of these six operators, yearly receipts and net return would decline, resulting in greater reliance on off-ranch income subsidies. For all six operators, borrowing power and equity value would decline. In the long term, these impacts would be mitigated and no significant social or economic impacts would result.

The land ownership adjustments proposal would result in slight social and economic impacts to current and future resource users.

The rights-of-way corridors and windows proposal would limit the duplication of extensive environmental analysis and reduce surface owner conflicts, resulting in a slight decrease in development cost. The right-of-way corridor north of Placitas was placed to avoid the Las Huertas Valley. Over the long term, conflicts with surface owners could be reduced. Development costs could increase if corridors did not provide the most cost-effective route.

None of the economic or social impacts expected under this Plan are considered to be irreversible and irretrievable.

ADDITIONS AND CORRECTIONS

Range Resources, Page 4-3

The first two sentences in the fourth paragraph of the section entitled "Range Resources" on page 4-3 should read:

> For the short term, it is assumed that livestock grazing use would continue at present levels **for the Section 3 permitted allotments.** Present level **for these allotments** is considered to be the average of the last five years of use or 7,990 AUM's (20 percent below current allowable grazing use).

Recreation Summary, Page 4-7

In the first sentence of the section entitled "Summary" on page 4-7, the word might should be changed to **would.**

Chapter 5

CONSULTATION AND COORDINATION

CHAPTER 5

CONSULTATION AND COORDINATION

INTRODUCTION

The initial sections of this chapter are devoted to consultation and coordination activities carried out during the preparation of the Draft RMP/EIS, the comment period, and preparation of the Proposed RMP/Final EIS. Comments and responses are also included in this chapter.

Writing of the Draft RMP/EIS document itself began in June of 1984; however, preceding the writing phase a complex process of data gathering and other preparatory activities began in 1979. This process included resource inventory, public participation, interagency coordination, and preparation of a Management Situation Analysis (MSA). The MSA is on file in the Rio Puerco Resource Area Office, as is documentation of the public participation and interagency coordination. Consultation and coordination with agencies, organizations, and individuals occurred in a variety of ways throughout the planning process.

CONSISTENCY

The BLM's planning regulations require that Resource Management Plans be "consistent with officially approved or adopted resource-related plans of other Federal agencies, state and local governments, and Indian tribes, as long as the guidance and resource management plans are also consistent with the purposes, policies and programs of Federal law and regulations applicable to public lands...." In order to ensure such consistency, letters were sent to thirty-eight Federal, State, and local agencies and groups. These same agencies and groups received copies of the Draft RMP/EIS and were asked to comment.

PUBLIC PARTICIPATION

A notice was published in the Federal Register on March 23, 1983 announcing the formal start of the planning process. A preliminary list of issues, together with an explanation of the planning process was sent to about 2000 individuals and groups in March 1983. The purpose of the mailing was to identify major issues in the RPRA and to invite the public to three public meetings in April. These three meetings were held to develop issues and planning criteria (see Table 5-1). In July 1983 a second mailing was sent asking for comments on the proposed planning issues and criteria (USDI, BLM 1983h). After the comments were received, the revised version of the planning issues and criteria was sent out in November 1983 (USDI, BLM 1983g). A tour of the Rio Puerco Resource Area for interested groups was made in February 1984. A fourth mailing in June 1984 contained the proposed management guidance and proposed alternatives (USDI, BLM 1984e). Three additional public meetings were held in July to help develop land use alternatives (see Table 5-2). A meeting with interested Indian tribes and pueblos was held in September 1984 to discuss American Indian concerns. The BLM later met with representatives of Acoma Pueblo and the Canoncito Navajo Band to discuss this RMP.

The ninety-day comment period for the Draft RMP began April 1, 1985 and ended July 1, 1985. The notice of availability was published in the Federal Register on April 2, 1985. In addition, there were public hearings in Cuba, Albuquerque, Estancia, and Grants to provide the opportunity for oral comments (see Table 5-5). The public was notified about these hearings in the Federal Register, local newspapers, and on radio and television. The pertinent portions of the public hearings are reprinted in this chapter. The full transcripts are available for public inspection at the Rio Puerco Resource Area, Albuquerque, and the Cuba Project Office.

Informal coordination with the public has taken place throughout the planning process through personal contacts, phone calls, and letters.

TABLE 5-1

PUBLIC MEETINGS FOR ISSUES IDENTIFICATION AND PLANNING CRITERIA

LOCATION	DATE
Albuquerque	April 18, 1983
Cuba	April 19, 1983
Estancia	April 21, 1983

TABLE 5-2

PUBLIC MEETINGS FOR DEVELOPING LAND USE ALTERNATIVES

LOCATION	DATE
Cuba	July 9, 1984
Albuquerque	July 10, 1984
Estancia	July 12, 1984

Comments on the Draft RMP/EIS were requested from the government agencies listed in Table 5-3 as well as from special interest groups and members of the interested public.

This Proposed Rio Puerco Resource Management Plan and Final Environmental Impact Statement was prepared by an interdisciplinary team of resource specialists. Table 5-4 lists the names and qualifications of each team member.

Continuing Public Participation

The Rio Puerco Resource Area will prepare an RMP summary update every year. The purpose of this summary will be to inform the public of the progress made in implementing the RMP. The summary will also describe the activity plans to be prepared the following year so interested members of the public can request copies and comment. The BLM hopes that this will enable the public to be involved in the specific land management actions resulting from implementation of this RMP.

Allottee Consultations

In compliance with Section 8 of the Public Rangelands Improvement Act of 1978, all permittees and lessees in the vegetative uses issue area have been contacted to initiate the required consultation, coordination, and cooperation process. For the "I" allotments, consultations with the affected allottees and parties were conducted in February 1985 to discuss the interrelationships of the range inventory, monitoring studies, and proposed management changes. Each of the remaining allottees was contacted by letter to inform them of their allotment's selective management category and the implications of this designation. Consultation meetings with these allottees were scheduled at their request.

TABLE 5-5

PUBLIC HEARINGS ON THE DRAFT RMP/EIS

Location	Date	Attendance
Cuba	May 29, 1985	16
Albuquerque	May 30, 1985	62
Estancia	June 3, 1985	4
Grants	June 4, 1985	10

Comment Analysis

In addition to the oral comments, 49 comment letters and 2 petitions were received on the Draft RMP as a result of the 1500 documents being sent out.

All letters and oral presentations were reviewed to determine whether they met the required criterion for response (i.e., discussion of the adequacy of the draft document). Substantive comments, those presenting new data or questioning facts or analyses, were fully evaluated and given responses which are printed after each letter. Changes or additions to portions of the Draft not reprinted in this document arising from public comments are included in each chapter in a section entitled "Additions and Corrections to the Draft Document."

The letters are grouped as follows: Federal agencies, State and local agencies, interest groups and industry, and individuals. Each separate comment pertaining to the adequacy of the Draft RMP/EIS has been identified with a code number (i.e., 21-6). The portion of the code number to the left of the hyphen is the number of the letter; the number of the comment is to the right of the hyphen. The code number above would be read as Letter 21, Comment 6. The BLM's responses follow each letter and are keyed to these code numbers.

RECORD OF DECISION

The Rio Puerco RMP will be approved no earlier than thirty days after publication by the EPA in the Federal Register of the notice of receipt of the Proposed RMP and Final EIS. The approval of the Plan will be documented in a Record of Decision which will be available for public review. Approval will be withheld on any portion of the Plan protested until final action has been completed on the protests.

TABLE 5-3

DOCUMENT RECIPIENTS

Federal Government

- Department of Agriculture
  - Soil Conservation Service
  - U.S. Forest Service
- Department of the Army
  - Corps of Engineers
- Department of Commerce
- Department of the Interior
  - Bureau of Indian Affairs
  - Bureau of Reclamation
  - National Park Service
  - Office of Surface Mining, Reclamation and Enforcement
  - U.S. Fish and Wildlife Service
  - U.S. Geological Survey
- Department of Labor
- Environmental Protection Agency

Tribal Government

- Santo Domingo Pueblo
- Sandia Pueblo
- Jemez Pueblo
- Isleta Pueblo
- Acoma Pueblo
- Santa Ana Pueblo
- San Felipe Pueblo
- Zia Pueblo
- Cochiti Pueblo
- Laguna Pueblo
- Zuni Pueblo
- Jicarilla Apache Tribe
- Ramah Navajo Tribe
- Canoncito Navajo Tribe
- Navajo Nation and Chapters
- All-Indian Pueblo Council

County Commissions and Planning Commissions

- Cibola County
- Valencia County
- Torrance County
- Santa Fe County
- Bernalillo County
- McKinley County
- Sandoval County

State Government

- Bureau of Mines and Mineral Resources
- Commerce and Industry Department
  - Economic Development Division
- Department of Finance and Administration
  - Planning Division
    - Coordination/Clearinghouse Bureau
  - Historic Preservation Bureau
    - State Historic Preservation Officer
- Energy and Minerals Department
  - Mining and Minerals Division
    - Coal Surface Mining Bureau
- Governor Toney Anaya
- Health and Environmental Department
  - Environmental Improvement Division
- Highway Department
- Land Office
- Natural Resources Department
- Department of Game and Fish
- State Engineer's Office
- Department of Agriculture

TABLE 5-4

LIST OF PREPARERS

Report Writers/Reviewers

Name	Assignment	Education	Experience
Angela Berger	Recreation, Visual Resources	BS Secondary Education MS Outdoor Planning	BLM - 5 yrs. Outdoor Recreation Planner, 2 yrs. District Wilderness Program Leader, 2 yrs. Supervisory Outdoor Recreation Planner
Don Brewer	Threatened and Endangered Species, Wildlife	BS Wildlife Management	BLM - 7 yrs. Wildlife Biologist, 2 yrs. Range Conservationist
Mike Fisher	Woodland Resources	BS Forest Management	BLM - 7 yrs., USFS - 3 yrs. Fire/Forestry
Kent Hamilton	Social and Economic Factors	BS Agricultural Economics	BLM - 6 yrs., BIA - 16 yrs. Economist and Land Use Planner
Herrick Hanks	Area Manager	BA Anthropology MA Anthropology	BLM - 5 yrs. Area Manager, 8 yrs. Archeologist
David Koehler	Soils, Vegetation	BS Range and Forestry MS Ecosystem Ecology PhD Range Ecology	BLM - 7 yrs., Supervisory Range Conservationist, USFS - 7 yrs., Range Conservationist
Tony Lutonsky	Cultural Resources	BA Anthropology	BLM - 11 yrs. Archeologist
Ron Montagna	Lands, Team Leader	BS Forest Recreation	BLM - 2 yrs. Supervisory Natural Resource Specialist, 2 yrs. Supervisory Realty Specialist, 4 yrs. Realty Specialist, 3 yrs. Natural Resource Specialist
Robert Muller	Lands	BS Forestry MS Recreation Management	BLM - 13 yrs. Realty Specialist
Gretchen Obenauf	Writer/Editor	BA Anthropology MA Anthropology	BLM - 5 yrs., BIA - 1 yr., NPS - 3 yrs. Archeologist
Betty Sladek	Planning Coordinator	BS Forestry MS Planning	BLM - 4 yrs. Community Planner, 6 yrs. Forester
Gene Tatum	Range Resources, Technical Coordinator	BS Range Science	BLM - 1 yr. Natural Resource Specialist, 6 yrs. Range Conservationist
Jim Turner	Minerals, Geology, Paleontology	BS Geology	BLM - 5 yrs., Bureau of Reclamation - 4 yrs. Geologist
Jerry Wall	Soil, Water and Air Resources	BS Forest Management MS Forest Soils	BLM - 7 yrs., USFS - 9 yrs. Soil Scientist
Mary Zuschlag	Team Leader	BS Natural Resource Conservation Science	BLM - 6 yrs. Environmental Coordinator, SCS - 2 yrs. Soil Conservationist

Support Personnel

Name	Experience (BLM)	Name	Experience (BLM)
John Arwood	15 yrs. Range Conservationist	Barbara Laskar	7 yrs. Lands Clerk
Bob Bewley	2 yrs. Geographer	Angie Medina	2 yrs. Supervisory Area Clerk
Karen Davis	1 yr. Range Clerk	Emilio Montoya	12 yrs. Cartographic Technician
Myrna Finke	2 yr. Visual Information Specialist,	Bill Overbaugh	2 yrs. Outdoor Recreation Planner, 1 yr. Recreation Technician
Janice Hinds	5 yrs. Clerk Typist		
		Carl Sweeden	2 yrs. Cartographic Technician

PROTEST PROCEDURES

Any person who participated in the planning process and has an interest that is or may be adversely affected by approval of the Proposed RMP may file a written protest with the Director of the BLM within 30 days of the date the EPA publishes the notice of receipt of the Proposed RMP and Final EIS in the Federal Register.

The protest must contain the name, mailing address, telephone number, and interest of the person filling the protest; a statement of the issues being protested, raising only those issues that were submitted for the record during the planning process; a statement of the parts of the plan being protested; copies of all documents addressing the issues submitted during the planning process by the protesting party, or an indication of the date the issues were discussed for the record; and a concise statement explaining why the State Director's decision is believed to be wrong. Any protests should be sent to the Director of the BLM at the following address:

Department of the Interior
Bureau of Land Management
18th and C Streets, NW
Washington, D.C. 20240

The Director will render a prompt written decision on the protest, setting forth the reasons for the decision. The decision will be sent to the protesting party by certified mail and will be the final decision of the Department of the Interior.

RESPONSES TO COMMENTS AND LETTERS

This section contains the comments and responses. Two detailed responses which answer comments that were received from a large number of reviewers are displayed first. The first detailed response discusses the reasons for the lack of specificity in the RMP/EIS. The other detailed response concerns the ORV issue; this response provides a more complete description of the impacts of unrestricted ORV use and reasoning for the motorized vehicle use restrictions in this Proposed RMP. This response should be read in conjunction with the revised "Soil and Water Resources" section in Chapter 3 of this document which gives a historical perspective on the erosion problems in the Rio Puerco drainage.

The pertinent portions of the public transcripts are reprinted next. Only the substantive comments and opinions are reprinted. Due to very limited participation in Grants and Estancia, neither of these transcripts is reprinted in this document. Complete transcripts are available for review in the Rio Puerco Resource Area and Cuba Project offices. The comment letters and responses follow the transcripts. Many of the substantive comments in the transcripts are not delineated because the speaker later submitted written comments. The comments are delineated and fully answered with the other comment letters.

Response to Comments Concerning the Lack of Specificity

The BLM received a number of comments concerning the lack of specificity in this RMP. There was also concern expressed about resource programs which were not specifically covered by issues. This section will provide a detailed response to these types of comments.

The focus of this RMP is on the needed changes in Rio Puerco's existing management program. The issues, which were developed after extensive public input, define those aspects of the resource programs requiring changes in management. This does not mean that no management will occur for those resource programs that are not specifically covered by an issue; they will continue under existing management.

Alternatives A through D should be reviewed only after reading the "Continuing Management Guidance" section. This section provides the detailed discussion of the existing management programs that will continue no matter which alternative plan is selected. The BLM believes that, in combination with the Continuing Management Guidance, all four of the alternatives are comprehensive.

The section in the Draft (and reprinted in this document) entitled "Continuing Management Guidance" on pages 2-1 through 2-23 discusses in detail the RPRA's current base management program. This section is based on the information contained in an unpublished companion document to this RMP/EIS, the Management Situation Analysis (MSA). The "Existing Management Situation" section of the MSA is a more detailed discussion of the existing management guidance applicable to the RPRA. The major sources of this guidance are laws, regulations, BLM manuals, Department of the Interior manuals, executive orders, BLM Washington Office instruction memorandums, and BLM New Mexico State Office instruction memorandums. In addition, the Rio Puerco Livestock Grazing Management Environmental Statement, portions of the East Socorro Grazing Management Environmental Statement, and the West Socorro Rangeland Management Program Environmental Impact Statement, and portions of the Ladron, Divide, Chaco, and Rio Grande Management Framework Plans provide guidance for the management of parts of the Rio Puerco Resource Area (Map 2-1 in the Draft). A summary of the land use planning decisions from the Chaco, Divide, Ladron, and Rio Grande MFP's is located in Appendix A of the Draft RMP; the decisions from the grazing EIS's are summarized in Appendix B in the Draft. The MSA and the detailed guidance it contains for the management of the RPRA have been incorporated into the RMP/EIS by reference. Management of the resources in the RPRA not affected by the resolution of the issues will be managed based on the detailed guidance contained in the Management Situation Analysis.

After the Proposed Plan is approved, a "Plan" will be published and circulated. This "Plan" will be comprised of the Continuing Management Guidance and the selected alternative. All environmental analysis portions will be omitted. This will be the Resource Management Plan that has been adopted in the Rio Puerco Resource Area.

Because the life of this Plan is expected to be about twenty years, the RMP is a generalized document. The purpose of this Plan is to provide managment goals and to allocate areas for specific land uses and resources. It would be very difficult to fully predict all of the specific "on-the-ground" actions required to fully implement this Plan. These specific details will be analyzed in subsequent activity plans (with full NEPA compliance) for specific areas or programs. These plans will detail exactly how specific SMA's will be managed—for example, where and how many water catchments would be installed in a specific SMA for wildlife, or the season of use or livestock grazing system needed for a particular allotment. Including this type of detail adequately would be impossible at this time because of continuing on-the-ground management responsibilities. Including such detail in a *pro forma* manner would quickly make the Rio Puerco RMP out-of-date, as well as making it inflexible, requiring numerous plan amendments.

Some reviewers who commented on the lack of detail in the RMP seemed to feel that this was their only opportunity to review and influence BLM's planned actions for the RPRA and therefore wished to see more specific plans for implementation of the RMP. In the past it has been difficult for the public to track management decisions and learn about the implementation of land use plans. In order to alleviate this problem the Rio Puerco Resource Area plans to publish an annual RMP summary update. This document will notify the public about the progress toward implementing the RMP and which activity plans and environmental analyses are planned for that year. The public will have the opportunity to receive and comment on any resource activity plans and environmental analyses which they may be interested in, and to track the progress of implementing the RMP.

The concept of preparing broad environmental impact statements with subsequent detailed activity plans and environmental analysis is known as tiering. Tiering of documents is fully acceptable under the Council on Environmental Quality (CEQ) Regulations for implementing the National Environmental Policy Act (NEPA). These regulations state (40 CFR 1508.28):

> "Tiering refers to the coverage of general matters in broader environmental impact statements (such as national program or policy statements) with subsequent narrower statements or environmental analyses (such as regional or basinwide program statements or ultimately site-specific statements) incorporating by reference the general discussions and concentrating solely on the issues specific to the statement subsequently prepared. Tiering is appropriate when the sequence of statements or analyses is:
>
> (a) From a program, plan, or policy environmental impact statement to a program, plan, or policy statement or analysis of lesser scope or to a site-specific statement or analysis.
>
> (b) From an environmental impact statement on a specific action at an early stage (such as need and site selection) to a supplement (which is preferred) or a subsequent statement or analysis at a later stage (such as environmental mitigation). Tiering in

> such cases is appropriate when it helps the lead agency to focus on the issues which are ripe for decision and exclude from consideration issues already decided or not yet ripe."

Response to Comments on the ORV Issue

The BLM received a large number of comments expressing a wide diversity of interest and concern for the ORV proposals of the Draft RMP/EIS's Preferred Alternative. These comments range from support of the restrictions on ORV use from State and Federal land management agencies to expressed concerns that ORV recreation use demands were not being provided for.

The ORV decisions needed to resolve this issue are: What areas should be "open," "closed," or "limited" to ORV use in accordance with FLPMA requirements? What land condition goals or objectives should be attained and maintained to deal with growing ORV demands on the public lands? (See Issues and Criteria, Chapter 1 in the Draft.) The main consideration for resolution of these issue questions "is protection of the resources of the public lands, to promote the safety of all users of those lands, and to minimize conflicts among the various uses of those lands" (43 CFR 8340.0-2).

Recreational ORV use has emerged as a significant topic within the larger RMP issue of ORV designations. Recreational ORV needs have been divided into three major categories--competition, play, and exploration--by Nelsen (1976).

Participants oriented toward competitive activity reap benefits from interaction with other participants as well as from the excitement of the race. Essential support activities, as well as pre- and post-race activities are an important part of a satisfying recreation experience for the competitive ORV user.

ORV play involves movement over the landscape with no specific destination in mind. The challenge of the environment, informal recognition of skill, and social interaction are important values. Supplemental recreational activities such as off-ORV social interaction, camping, or general play may be critical to a quality ORV play experience.

Those using ORV's for exploration often use their machines primarily as a means to an end. ORV's allow participants to travel to areas where they can engage in other kinds of recreational experience. Appreciation of amenity values may be more important expectations than competitive excitement or group identification.

These types of ORV recreational experiences are not mutually exclusive, and often overlap. They do serve, however, to define some of the parameters to be considered when managing for ORV recreational use.

The current trend of increased demands for ORV use in the RPRA is expected to continue as the State's major population center, Albuquerque, continues its growth. While ORV use refers to all types of vehicular use, not just motorcycles and four-wheelers, statistics projecting future ORV demands have been easier to obtain for recreational ORV use than for other types of ORV use. The BLM requested ORV sales information from seven Albuquerque dealerships specializing in all-terrain vehicles and dirt bikes. Two of these dealerships had just opened in January 1985, and could provide no data. Sales of all-terrain vehicles and dirt bikes for the other five stores increased from 567 to an estimated 2002 units between 1980 and 1985, a 51 percent average annual increase in sales for these years. These statistics illustrate the trends on which long-range ORV use forecasts were based.

The most direct and immediate impact from increased, unrestricted ORV use would be to the soils in the RPRA. The Rio Puerco Valley and contiguous lands have been widely publicized as constituting perhaps the most dramatic example of human-caused desertification in the western United States (Council on Environmental Quality 1981). Overgrazing and other human-related events caused these lands to be denuded of protective vegetation in the late nineteenth and early twentieth centuries (SCS 1937). Subsequent erosion stripped the topsoil and exposed unstable subsoils. The surface soil material for the entire Rio Puerco Grazing ES area has been rated by the Soil Conservation Service (1968) as having severe to highly severe erosion potential. Several factors contribute to this extreme instability: (1) the soils consist primarily of mineral particles (predominantly clays or clay loams) with little or no organic material in the vesicular or "A" horizon; (2) since these soils typically do not form aggregates or "soil crumbs," they are readily suspended in water; and (3) most of these soils have high sodic characteristics which cause soil particles to be highly dispersed and easily erodible. In short, Rio Puerco soils have textural, structural, and chemical properties which make them extremely fragile and vulnerable to disturbance.

During the period of most rapid degradation (1880-1945), eroded soil material entered existing water channels and the suspended solids amplified the scouring action of runoff waters. As stream channels cut vertically downward, the water table was lowered accordingly. Sequentially from downstream to upstream, dams constructed to irrigate alluvial bottomland were breached and destroyed, the last of which washed away in 1951. The rapid expansion of massive arroyos had, by that time, defeated any possibility of continuing agricultural enterprises. Dortignac (1956) described the area as one of the most spectacular displays of gully erosion in the American West. It is unclear whether the millions of dollars expended on surface treatment, stabilization, and grazing management by Federal agencies contributed more towards equilibration than the simple fact that environmental destruction on a massive scale caused an abrupt exodus by ranchers and farmers. A drastically reduced population and diminished interpersonal competition for resources made lesser demands on the fragile lands. Nevertheless, the area will not, within the forseeable future, be restored to its former productive capability.

Any use or activity which increases surface disturbance can disrupt or reverse the natural processes of secondary succession which are presently moving the area toward greater stability. It has been well documented that unrestricted ORV use could create new erosion problems.

There seem to be two basic soil responses to ORV use. First, sandy and gravelly soils are susceptible to direct quarrying by ORV's, and loss of vegetation causes rapid rill and gully erosion. The second type of response occurs with more clay-rich soils which are typical of the Rio Puerco Grazing ES area. These types of soils are less sensitive to direct mechanical displacement by ORV's, but have higher erosion rates compared to natural conditions. In addition, ORV use on clay-rich soils produces strong surface sealing thereby reducing infiltration, and increasing runoff and gully development.

Eckert and others (1979) suggest that casual off-road vehicle use is least damaging to the following desert soils: (1) coppice soils, which have high organic matter content and aggregate ability which prevent soil movement; (2) desert pavement, which has a gravel- and rock-mulched surface; and (3) unstable and unvegetated sands, which migrate according to prevailing winds. None of these soils occurs on public land in the Rio Puerco Resource Area. Many of the still-active arroyos and gullies are said to have originated from wagon roads and other wheeled traffic. The present and recent strategies for stabilizing the soil surface require maximizing the protection afforded by vegetation, algal crusts (cryptogamic soils), and surface litter. Wilshire (1977) notes that a single vehicle pass in arid and semiarid areas is commonly sufficient to destroy the natural barriers to erosion. Numerous researchers have documented the reduction of protective vegetation due to casual use. Schultink (1977) reported an average annual vegetative loss of about six percent on terrain sustaining casual use by ORV enthusiasts.

The effects of ORV use on the physical and chemical properties of soils has been reported by Webb and others (1978). In response to intensification of ORV use, surface strength is decreased; bulk density is increased; soil temperature fluctuations are increased; and soil moisture, organic matter, and soil nutrients are decreased. These soil responses create conditions which increase the soil's erosion potential and impede its natural ability to support vegetation. Vollmer and others (1976) specify that desert soils are particularly vulnerable to this type of destruction and add that damage may not become apparent for years or even decades after the original disturbance. Wilshire (1983) states that soils of desert ecosystems do not recover from compaction for about a century. If erosion occurs, however, the recovery time is much longer. Recovery of perennial plant communities requires time frames measured in millenia to recover in some desert ecosystems.

The use of ORV's on arid lands is reported by Hallet and others (1981), Hinckley and others (1983), and Snyder and others (1976) to accelerate the amount and frequency of water runoff, sheet-wash erosion, and sediment yield. The latter authors measured eight times more runoff from areas used by motorcyles than from unused areas. Soil compaction and reduction in permeability appeared to be the most serious hydrologic consequences of motorcycle use. Hallet and others (1981) believes that such responses are due to a decrease in soil porosity, infiltration capacity, and hydraulic resistance to overland flow. Effects that result from even low densities of vehicle use are long-lived and soil loss that occurs may be irreversible on a human time scale. The conditions that Webb specifies as minimizing vulnerability to vehicular damage--low-intensity rains, high infiltration rates, low slopes, and abundant surface sand and gravel--are not widely found within the RPRA.

The BLM, therefore, believes that the soils in the RPRA are not compatible with "open" ORV designations. In addition to accelerated erosion, continued "open" ORV use would eventually result in irretrievable and/or irreversible commitments of other public land resources. Vegetative vigor and productivity would decline, resulting in the loss of vegetative cover for watershed protection and nongame/small game wildlife habitat, and resulting in declines in forage available for big game wildlife habitat and livestock grazing use. Uncontrolled expansion of ORV trail networks would result in a decline in the acreage available for undeveloped recreation opportunities, would provide increased access to cultural resources resulting in increased vandalism and theft, and would provide additional access that would facilitate theft of woodland and forest products. In addition, accelerated erosion would expose more cultural resources to the deleterious effects of wind and water.

In conclusion, it is our opinion that the Preferred Alternative, including the ORV limitations, provides for the best balance of resource uses and management which will protect the resources of the public lands, promote safety of all users of those lands and minimize conflicts among the various uses of those lands, while meeting the FLPMA requirements of sustained yield and multiple use management. In addition, we believe that the majority of the ORV uses will be provided for under this alternative. Permitted competitive events, such as the "Oh-My-God 100," will continue to be authorized as not limited to existing roads and trails. The trials bike area will meet both competitive and play needs, while the dune buggy area will meet competitive needs. In addition, an ORV recreation trail system composed of about 124 miles of existing roads and trails will be designated (see Pocket Map E in the Draft). This trail system includes a variety of route conditions from primitive to graded, and is designed to accommodate both day-use and overnight experiences through a variety of terrain. It will accommodate both play and exploration needs for a variety of ORV recreation types. Additional trail systems can be developed and managed in cooperation with user groups as the need is identified. These would be designed to service a variety of skill levels and user types. The BLM would work with local user groups to identify an open ORV play area if requested by these groups. The Rio Puerco has over 1500 miles of roads and trails already inventoried, many of them extremely primitive, which can provide for most ORV recreational experiences.

Pertinent Portions of Transcript from Public Meeting at Cuba, May 29, 1985

MR. RUDY GUTIERREZ: I am Rudy Gutierrez. I represent myself and the Gutierrez family corporation, and I am President of the Rio Puerco Livestock Association. In all we've seen in the literature and so forth, we're concerned about what I term a definite usurpation of the land. Lands seem to disappear over the years right from under us, and we don't know where it goes, we don't know what it does. Occasional rain will refresh it some and some of the vegetation will come back. And the unwanted plants like sagebrush and so forth seem to take over and do more good in growth than the good plants that we're trying to increase or trying to protect and so forth.

The livestock people are definitely concerned, because we are trying like mad to control all abuse of every kind that happens to the land so that we can make effective production from a good stand of grass or weeds or whatever they may be, but we see the influx of others that want to take over free for all. We at least pay fees to graze our livestock, and others just don't seem to tend to that business or prevent them, that they can come and use and abuse the land in whatever--in the manner they wish.

And public lands, I suppose, are going to be public lands from now on. Multiple use is going to be from now on multiple use, but we probably lost ourselves somewhere along the way in the concept that we have to be careful what we do with the land. The tremendous number of roads that are being built all over the countryside by oil drillers, gas people, hunters, sightseers, and others--and they just don't seem to follow the old trails or roads that we ourselves helped to make. They will use the land to make growth. They see a nice spot in the hillside out there, and you're cutting a ten-inch rut with your vehicle, a four-wheel drive, and they just don't seem to be particularly concerned about how much evidence they're leaving behind that they were there.

The hunter himself is also very guilty of doing a lot of abuse to the public lands and the forests, and we now seem to feel that the administering agency, BLM, Forest Service, and others have stated so, do not have enough in their books so that they can put restrictions on the use of the land. I suppose maybe restrictions would be the wrong term to use. The ultimate result of the doing of everyone would be to have authority to control whatever the outcome may be.

We've heard a lot of conservation talk through the years, and we ourselves, the livestock people, have engaged in some -- Rick wanted me to state, or he said in his preliminary remarks there, that we have public -- part of the land out there. We happen to have 646 acres that are our private land, and our private lands haven't seemed to be any more restricted than the public lands. There's roads on it, there's hunters on it, there's pinyon pickers on it, there's wood haulers on it. And now as of late, many sightseers.

We know that there's a petition in the files signed by almost every off-road vehicle dealer in the neighborhood that would like to see that the use of the public lands is available to them whenever they take a notion to go anywhere they want to go. And we ourselves feel that we, the livestock people, have suffered considerable restriction through the years. We have to go by quotas, we have to go by pastures, we have to go by a number of things that were expensive in a way to make. And somehow we ourselves did it or helped do them or whatever the case was. And this is why resentment of the livestock people comes in, that we who try like mad to do one thing have to suffer the effects of the other side of the approach.

I believe that in due time, most of these people are going to find out that perhaps all of us are going to go downhill and not produce the fine products that we do. I think everybody in this country enjoys meat, and they relish it. And some of the importing that they have been doing in the past few years from wherever they do it is in competition with us. Maybe they have different land conditions, different regulations, different ways of doing it, and they can produce possibly at a cheaper rate than we can produce in this country. And we ourselves feel that with this type of competition, with all things going darn near against you for everything that you try to do, we are hopefully just keeping our heads up and hoping to survive.

One of the things that we ourselves--and in this I am speaking primarily as the President of the Association, and I am going to ask all of you boys here to pass the word along to sign this petition. We have tried to get headings that would fit the situation, that will help control the problem somewhat. And after all these environmental impact statements and everything else gets developed, maybe some good will come out of it so that we can all somewhat live together, and be happy somewhat with what we will do. Thank you very much.

BLM PANEL: Did you have any specific restrictions that you have in mind, when you spoke of restrictions on the land?

MR. GUTIERREZ: I think the restrictions that should be put into effect would be--I think it would be almost impossible and difficult to put in a restriction on something and make it stick, but if there is a restriction and somebody abuses that restriction, that puts the horse on the other side of the fence. See what I mean? Restrictions possibly will not be livable. It depends on who makes them. But our feeling is this, that there has to be control.

BLM PANEL: Of what?

MR GUTIERREZ: Of use and abuse of the land in making roads, in making the erosion mandatory, shall we say, because that's what happens out of the use and abuse of lands. And that one example, for example, is this motorcycle deal that they have down here around San Ysidro [the Oh-My-God 100]. You put 700 vehicles out there in the field, and you can imagine what they are going to do to an area in no time. Every rain after that, vehicles have to go down the river, and that's bad. Possibly, and this is just a guess, that an area should be located somewhere where you feel that you will not do anything for anybody except maybe a recreational area. They can destroy that if they want to. Do you see?

MR. MEL MARTINEZ: Well, I'm going to be, I think, quite brief. I'm Mel Martinez, by the way, Mel Martinez, and I'm a local, third generation rancher. And I'm also a member of the Rio Puerco Livestock Association. And a lot of comments that Rudy made are certainly -- I second every bit of what he stated.

I've got very specific points to bring out on my own. I will follow up with a written comment regarding some of the specific areas that I have reference to.

First of all, I want to thank all of you for the opportunity to express some thoughts relative to the Rio Puerco Resource Area Management Plan. As ranchers here, or as a rancher, and user of public lands, I'm extremely concerned. And as Mr. Gutierrez stated, you know, about the same exact things.

While I agree with the concept of multiple use, or should I say, I have no control over it, I have great reservations as to some of the uses of public lands. Of prime concern right now, of course, is the unrestricted opening of the lands for ORV use. Now, I have heard statements and communication. I've talked with people and I've heard -- I've read statements in the papers, news media and that stating that they have the same rights that we have, people that are using ORV, ORV users. They pay taxes and so on. And I agree very much so with that. But still we have to consider the indiscriminate use and abuse that results in the adverse effects of, naturally, the public lands that we're talking about.

And along those points, I'd like to make reference to some very specific points, like I stated a moment ago in regard to, let's say, the rancher versus the ORV users, or other multiple users that are abusive, that don't protect the lands that we have.

Number one, and this I want to say very clearly--I want to state it clearly. The livestock industry, ranchers, use these lands for economic purposes, to provide a livelihood for their families. And that versus the ORV users who use it strictly for recreation and pleasure. While I'm not against it, I do have my means of having my own recreation, satisfaction in terms of satisfying my ego. However, I have respect and courtesy for other users, and that's all that I ask. So that point I want to make very clear. The economics of it versus just simple pleasure.

Number two. The ecological and environmental effects of ORV, or unrestricted ORV use. I don't have to go on, but at least to mention some of these things. Okay, the adverse impact on vegetation is something very, very serious. We pay for some of that vegetation. We pay to use the public lands. The result naturally is, we go in conflict with the ecosystem. There is no question about that. It's causing erosion and so on.

Now, while some ORV users are responsible people--I have no problem with that--I do know though that we have a good portion of them that tend to forget the responsibility when they get up there into that, to using the public lands. They do start indulging, and I'm not against that. It's everybody's right to have their parties and have their drinks and that, but I think we as respectable citizens should be able to control ourselves in terms of the courtesy that we owe other people and the respect that we have for the public.

And what I'm trying to say is that once people get out here, that percentage, whatever it is, that tend to abuse are those that start indulging in, let's say, drinking. Once they get into that, you can imagine what happens. They forget that you make a living off that land that they're using. So, that is one of the points I want to bring up, that it happens. And once they do that, for example, another point that I want to bring up, and I have seen some to a degree, but I've heard of some people doing this. They get out there in those trail bikes. For kicks they chase livestock, wildlife. That's our source of income.

Okay. That is not all that happens. In turn, you know what livestock do all right. I'll set the example of elk. Wherever there is a concentration of elk, it's a difficult job to keep your fences up. And that's exactly what happens, even our own livestock will go through those fences. And that's a lot of what happens, also.

Once indulging people, or people that are careless, or some people that are hungry or some people that I have said something against--somebody may just go out there and the result can be cattle rustling, livestock rustling. That can happen. Along that line, poaching. And although I don't agree a lot of times with some of my fellow people, you know, in terms of the way, for example, there are certain areas that I have reservations about the wildlife situation and that. Yet, in terms of what I'm talking about, it does affect them, also. And I'm certainly for controlling that.

Okay. Another thing, another point that I would like for it to be clarified and put down on record is that once these people are allowed to unrestricted use, what's going to happen is fence cutting. They're not going to stop. While I say that, some percentage will have some respect and courtesy for others, some percentage, also, is going to go through fences if they want to. They're going to cut fences if they can't go through the gates. And if they go through gates, there is a good chance that they will leave them open. So, again, those are some points that I'd like to have on record, so you will know what I'm talking about. And that, I believe, would be the general--my general feeling of what the adverse effects of ORV use would be. Thank you.

BLM PANEL: Have you been having any of these things happening so far?

MR. MARTINEZ: Well, the things that I notice more obviously than anything else is, for example, they get out there on the range and they don't consider then condition of the terrain. For example, if it's recently wet, they don't care. They just want to see what that vehicle does out there, and they disrupt, and that's very obvious about this time of the year, after the snow melts.

BLM PANEL: Do you have multiple use of your area now?

MR. MARTINEZ: Users still going through.

BLM PANEL: People ride motorcycles out there?

MR. MARTINEZ: There are some. Not to a high degree, but there is some, but what I'm scared of is that, you know, if it's open for unrestricted use, that actually you'll get groups out here. And that's my concern at this time.

And, in fact, let's see. I have on here -- I left one out here, one of the points that I had. I feel that ORV use should be limited to existing roads and designated trails where there is such a thing. And also, that there are areas where there won't be no effect on anybody else. It will not be in conflict with most people. And there may be those kind of areas that can be strictly designated very specifically for that, and they can like, like Mr. Gutierrez said, do whatever they want with it. And then, again, something else I've left out and forgotten.

Although it's not specifically my preference, if I had to write my own, it would be all together different. However, as far as the proposed alternatives that are in the manual, in the Draft of the Statement, if I had a choice, or the lesser of all the evils would be the Preferred Alternative to provide balanced management, which is Alternative D.

MR. RAY LOVATO: I'm Ray Lovato, and I'm also a permittee, and I have land surrounded by government land all around. And I don't think there's any sense in repeating what Mr. Gutierrez or Mr. Martinez said, because I'm in full agreement of every detail of it. And I've seen a lot of things that have happened in the public lands. So, I just wanted to be in the record that I'm in full agreement.

MR. ROBERT JOHNSON: I'm Robert Johnson, rancher. I also have land, and a permit with the BLM. I think, in looking over the Environmental Impact Statement and Proposed Final Management Plan, what really concerns me is that it seems as though over the last -- an observation over the last 25 years of operation of the BLM and Forest Service and SCS from the beginning back under the old LU, I've seen this land. I've seen it ripped. I've seen it pitted. I've seen it chained. I've seen it brush gutted. I've seen it burned. I've seen millions of dollars spent on it by different agencies who have been in control over the past 20 or 30 years. And I see in this where there is proposal of combining allotments.

In the beginning they say they are going to have to cut permits, but in the long run, by the year 2000, there's going to be something like 3,000 head increase in the carrying capacity of these permits. I really just want to make it for the record that I do not feel this is practical. I've seen millions of dollars spent here in different programs. I'm sure they were meant to be good, to improve the land, to increase carrying capacities, but in observation, I've seen the rabbit brush increase, the sagebrush increase, mustard increase, all types of vegetation that we didn't use to have. Well, we had these, but they seem to be on the increase. And in my opinion, carrying capacity will possibly decrease of what this country used to be 10 to 15 years ago.

I do not think that all of this is because of the particular types of management that has been on the land. I think a lot of it is environmental. We've had moisture in the fall and spring, and no moisture during the summer, which allows the plants that are not really beneficial to increase. I don't think this had anything to do with grazing or the many different processes that have been implemented to try to improve the forage. Nearly all of the plants that were planted here, many of them came up and did well for three or four years, but then they seemed to die out. And then instead of being a benefit, it seemed like where the mature sage was, that we got a tremendous increase in the small sage, which is eventually going to mature and choke out, in my opinion, the beneficial forage in the areas.

Another thing that I've seen, and we've had a few million-dollar water system implemented, and this has been abandoned and turned over to the ranchers. They have been charged a fee on a monthly basis. And this system was implemented without any consultation or cost-effectiveness that I could see to the ranchers. And I'm afraid that if the ranchers were expected to pay for all of the projects that have been implemented on these lands without any consultation or input, then, I think, the long-term effect is going to be the actual removal of ranchers who, many of them, myself.

I was born and raised in this area. I've spent a lifetime in ranching here. I had hoped that my kids and their grandkids would possibly be able to continue ranching on these lands. We would much prefer to operate on private lands, but due to the -- in this area, being that 80 percent of the lands available are either Forest, BLM, or State, or Indian reservation, there are no other lands available for people desiring to obtain this lifestyle and things that they've done all their life to do anything else but operate on BLM lands.

And I just feel that with the grazing fee increases that are being proposed, and all of the other things that I see implied in this Environmental Impact Statement and the management proposals that are in this Environmental Impact Statement, that if these are implemented and put into actual fact, I see that the ranching industry in this area is going to be greatly affected and possibly done away with.

I think this is going to dislocate many people in these small communities, such as Cuba. I think it's going to affect the banks, the banking industry. Certainly, will not ranchers who, in the past, have been able to use these lands and things as collateral for loans and doing business and operating their business, it's going to certainly not have that available in the future. And I think that this is going to certainly affect and to the detriment of the Southwest, Cuba, and the entire area if all of these things that are in this are implemented.

I appreciate this opportunity to be able to come and express my opinion here tonight. And I will answer any questions, if you have any. Thank you.

MR. JOEL TAYLOR: I wish to state just one thing. I'm Joel Patrick Taylor. I've spent 65 years around here ranching all the time. I'm 83 years old. I would say this. Let's all of us be careful with the land. It will always be ranched by somebody. We won't be here, but somebody will still ranch this land, and the rancher will still be here and all of these other people, regardless of who they are or what they do, they will come and go, but the rancher will still be here. And it will still some how or another exist on the land, because the land is not fit for anything else but grazing, except a little spot here and there that's irrigated. And some place a little settlement will spring up and they may have a little manufacturing or something. But the main portion of the land will still be used by the ranchers.

And if we don't make it so that he can make a living here, these other people will run over him. They're there one time some of them. They may come back a few years later, but they never do anything but go over it and look at it, and leave their trash. So, let us all try to work out some kind of a plan that will take care of the man who stays on the land all the time, and still try to welcome these people. I would like to see them all, not like they own the country when they come out. When we go somewhere through these settlements, we go in if we want to see some of that. We go in and introduce ourselves and talk to him. If we want to get on his land, if he has something, we ask permission. But most of these people that come out don't ask permission to do anything. They come on their own just like they owned the whole country. And there's nothing much we can do about it unless the government men help us. They could police the country or give the ranchers who stay there all the time some kind of authority to do the same on his part of the land. I thank you.

MR. LOVATO: I would like to say something on the comment that Mr. Taylor made. It's definite that most of them will come and go, but the rancher will be here, but the erosion that develops from all of that, I think it's going to be terrible. Even if they go, the erosion, it would be part of the land, even though the rancher would still be here, but he's going to have to put up with some of the big arroyos that are 15, 20 feet deep eventually.

MR. GUTIERREZ: I mentioned in my former statement that we had an invasion from the oil industry and from the gas industry. And lo and behold, based on the excuse of their knowledge and that they're producing a product that we need, definitely need for the propulsion of automobiles, et cetera, which is oil, and gas to heat ourselves and cook, but in so doing, they'll establish a well site in a location and build a road to it. Necessarily, I would think that nothing could happen without that road system to there. But this is what they're doing. They're building short-cut roads. Instead of just using one road to that well site, they'll go to the main road and there's another short-cut road in the north, another in the west, another in the east, the south. And as a consequence, there's many, many roads leading to one location that could be served by one road. And I'm sure that all of these people who live out there who live happily, they'll back me up on that. I've seen a lot of it on the north part of the reservation and whatnot. It's just full of it. Alternate roads that do not serve any purpose. Thank you.

MR. JOHNSON: I'd just like to comment on the off-road vehicle. This is, I think, being abused more by local people than people that are outside, people who are going out to get wood primarily. They are cutting fences. They are cutting ours, on every side.

Certainly the oil and mineral industry has done a detriment -- well, maybe not a detriment, but they've certainly done some of the ones of the seismograph. They've taken cats and built roads straight cross-country all over the area out there, and then other people start using these areas and they do develop roads on it. In our particular area there, I haven't seen that much of roads at the present time. There is some that are certainly affected. But I would say the wood haulers are people like this. We do have some motorcyclists and three wheelers, which venture in and out of Elk Canyon, primarily on weekends to sightsee.

But to me, this is not -- what I want to say is detrimental, but I don't think this is threatening a ranching business as much as the implementation of all the rules and regulations that are being implemented in that book. Just between you and me, that's the way I feel about it.

I've seen where cutting these places in the smaller pastures, and you know, we think that seasonal deferral is going to increase forage. But I can show you ranches that have been there 20 years that have not been grazed in the summer time. One of them is Chacon right north of mine. But like if you go out there and look at that place and see if you find that it has really increased in carrying capacity by seasonal deferral. And I think that these are some of the things that if we're going to continue ranching, they're going to have to be looked at. Something is going to have to be done to control the sagebrush. That's the way I see it.

MR. MARTINEZ: In observing, I do agree with Mr. Johnson that there's really not that much outside impact as far as ORV goes, or ORV users would go. However, my reference in statements that I made a while ago were based on letters that I've seen from Yamaha, from Honda, from all the dealers that you have in Santa Fe and Albuquerque and throughout the State, the ones that sell the goods. And what they're doing is they're promoting and they're saying, "Go north of Albuquerque. There's open land. There's a lot of -- eighty percent of the property is public land." And they are taking heed to that, and they're listening. And there's groups where you have hundreds and hundreds of people that go get together. And my concern at this time is not what -- as much what they're using right now or what they're doing right now as what will come. And I'm afraid if, once this matter that's been planned goes through, and let's say we stick with Alternative A that holds unrestricted use, they're the ones that are going to dictate how the land is going to be used, and not us. That's my concern.

MR. GUTIERREZ: There's one thing we haven't discussed. We haven't said anything about it here, and it hinges on this whole problem, is the game. The Game Department seems to just have taken over. They plant game anywhere they want to without asking anybody. They increase to such numbers that they'll graze forever. I've got some areas now here, private areas that are only grazed by elk. We've watered them. We furnish them salt. And we provide the feed during the critical times of the year when they cannot get it in the Forest or BLM. And then they rip our fences to the point that it is so doggone expensive to keep them up.

And what the deer and elk don't knock down, the hunters do, leave gates open, and not latched up when they go over the place. I would hate right now for anybody to come and just force me to stick to my grazing plan, because it's darned near impossible. There's so many gates left open all over the place. And one of the patterns has come up. Two or three pickups will come together. One will be loaded and set in a spot. The other they use to scour around. And the other is the lead off pickup, lead me off. See what I mean? They will kill calves or pick up young calves or whatever and put them in the second pickup. That's how much I've studied their method. And I've lost a number of livestock to them.

And when I see one, well, the one that's got the calf will be hidden right down in the middle of the tallest sagebrush or behind some trees or whatever. The other will have wood, just in case I happen to meet that one. And sometimes they do this. They will put a calf and pile wood on top of it. And then the empty pickup will be there close by when I come by. That's the one that makes the run, so I chase that one, and the others will stay behind and follow another route out the other way.

So, as a consequence, there's gates where we don't even expect them to be anymore. Loss of livestock to an abuse of our neighbor partners, permittees, by our livestock, because it's impossible to keep gates and fences up when they're doing that type of thing. And the worst part of this happens during the pinyon picking era or pinyon picking time. They camp all over the place under the excuse of picking pinyons and whatnot.

I found a rope strung from one tree to another full of jerky. It didn't have my brands on, but one calf was missing. So, where did my calf go?

MR. TAYLOR: I'd like to say one thing about this off-road traffic. When we make a road across the country and maintain the road, we expect people to travel it, but nobody, especially the ranchers, don't expect to ever find a man out on a private ranch where he doesn't have a permit, on private land just driving around over the country. I think some way or another, if a rancher is ever able to ranch with any satisfaction, they will have to have some way stop the traffic just over the country, when they leave the road and go off the road -- so it's open for public traffic. He has to go through the gates to get in, and it's just ranch roads and ranchers go out to see about their cattle, go out to the watering places and one thing and another. Well, very often we find people from a farther away town, or maybe just down, say, in Albuquerque or in Farmington just driving around over your ranches.

I stopped one and asked him what he wanted over there, and he had been on a high point for quite a while with a pair of field glasses watching the country over. And I spotted him and he had been sitting in one place for quite a while, just one man in a pickup. He just sat in one place. So, when I saw him leave that place, I jumped in my pickup and got out on the main road coming out of that area, and happened to be I was on private land when I stopped him. I asked him what he was looking for over there, what he wanted. He said, "I was just over there looking around," he says. And that was month or a month and a half before hunting season. He said, "I think I'd like to come out in this part of the country and hunt. I'm just looking around to kind of size up this country and see where I'd like to hunt."

Well, a man can make up any kind of an alibi any time you stop him, something that will sound plausible, but as long as we're losing cattle over the country and you see people travelling these off-roads and sometimes just a track out across the sagebrush, I think that should be stopped some way or another. And we ought to get that into the document some way so that everybody will know what's going on out here. And if that thing is happening, and it's not just recently. It's been happening for years. And any man can see whether it's a maintained road. If that was advertised via the government, via the BLM, and different ones, it was put into print and once in a while put in the news, it would prohibit going in without making an appointment if you want to go into the private permit where there's no road coming in, that you make an appointment to see that area for the BLM land that has authority in the area or the man that owns the ranch that is running cattle through it.

And people that are authorized to go into the country, that has the business of going there, they're always welcome because they have business there just like we do. But we find people that you don't even know out driving around over the ranches. Well, you wonder what they're up to, and I'd like to see it stopped. Thank you.

MR. JOHNSON: I'd like to make a comment about off-road vehicles. The ranchers are paying fees and nobody else is paying fees to do that. What are they paying? They get to go out on the land whenever they want to. At least we're paying the fees to use that land. And if they want to go out there, I think they ought to pay dues, too.

MR. BEN TAYLOR: I'd like to make a comment about that off-road vehicle. We have a lot of problem with the people hauling off the wood more than anything, going off the roads anywhere. And say you're off out there in the middle of a sage patch and they just take a road that's right off across the sagebrush area there and tear up all kinds of ground and whatnot all through there. You can see the different erosions that are caused. Just the runoff in the spring this last year, there was a lot of erosion because of people going off those roads just anywhere. If it's got fences, it's stealing wood off the private land.

Pertinent Portions of Transcript from Public Meeting at Albuquerque, May 30, 1985

MR. BLAIR JOHANSON: My name is Blair Johanson. I reside in Albuquerque at 10225 Betts Drive, NE. I am the representative of the New Mexico Off-Road Racing Association, and would like at this time to read a prepared statement regarding our position on the Rio Puerco Resource Area Management Alternatives.

The New Mexico Off-Road Racing Association will hereafter be referred to as the Association within this statement. We are a non-profit corporation, based in the Albuquerque area, with additional members and affiliates in Las Cruces and the surrounding southern New Mexico area. The purpose of the Association is to provide a legal, organizational structure to foster and support the construction and use of Volkswagen-based dune buggies and off-road racing cars. Our Association charter states that the Association was formed "for the promotion and encouragement of off-road racing as a hobby." We are heavily family-oriented Association, with husbands, wives, sons, and daughters participating in all facets of our sport. The membership is split approximately 60-40 into racing and non-racing members, with the non-racing portion of the membership supporting the racers as organizational, technical, and safety personnel at racing events. In addition to racing events, we hold fun-oriented activities as well. These include fund-raisers, picnics, barbeques, lake trips, touring events, and non-vehicle oriented activities such as golf days, club olympics, and swimming parties. As I have stated, the Association is heavily family-oriented, with members coming from such diverse fields as doctors, lawyers, car dealers, postmen, dental technicians, armed services personnel, scientists and workers from Sandia Laboratories, small business entrepreneurs, as well as construction workers, house painters, housewives, and college and high school students.

As an interested party, our Association has been in frequent and active communication with the Albuquerque office of the BLM, which manages the Rio Puerco Resource Area. This communication includes phone calls, letters, face-to-face meetings, and investigative tours of actual and proposed off-road vehicle use areas in which both Association members and BLM staff personnel participated. In short, we are both deeply committed and heavily involved.

I would like to begin by protesting the term "consumptive users" used by the BLM staff to define off-road vehicles and their operators in their impact on the land. T-1 Land use studies and Environmental Impact Statements from other areas of New Mexico indicate minimal or negligible impact to the environment by off-road use. Also, Environmental Impact Studies of the "Oh-My-God-100" use area, following reseeding and replanting, stated that it was difficult to determine off-road use areas from non-use areas.

T-2 We, as a group, also protest the frequently recurring slander of off-road users in the Draft Management Plan by referring to us as harassers and stealers of livestock, vandalizers of private property, destroyers of fences and water tanks, and illegal woodcutters.

As regards the Draft Rio Puerco Resource Management Plan, the Association membership unanimously and vigorously supports Alternative A of the Plan. No other Management Plan Alternative is acceptable to the Association membership. Furthermore, no other alternative is viable when existing congressional guidelines are observed, and internal BLM management directives are considered.

T-3 The Congressional guidelines which affect the BLM's Rio Puerco Resource Management Plan state that Federal lands be open and accessible for recreational use by the people. This is stated with the emphasis on the word public, in reference to public land. Only Alternative A allows this accessability. Other management alternatives close or severely limit this access.

T-4 Internal BLM guidelines state that adjacent management areas must have identical, or at least basically similar, Resource Management Plans. Since management areas adjoining the Rio Puerco Management Area are currently under management plans the same or essentially similar to Alternative A, we can only point out that the Rio Puerco Management Area is going against internal BLM policies if it implements any other alternative than Alternative A.

Under the Draft Rio Puerco Resource Management Plan, Alternative A is the continuation of current management, and is referred to as the No Action Alternative. No new off-road vehicle closed or limited designations would be implemented under this alternative. All public lands would remain open to motorized vehicle use, except the Bluewater Canyon Area of Critical Environmental Concern, also known as the Bluewater ACEC, and those additional areas currently under Interim Wilderness Management, which allow off-road vehicle use only on existing roads and trails. We accept and support the decision to implement the Bluewater ACEC and the Interim Management Areas, and consider them items of no contest within the Management Plan proposal. As we do not see ourselves as consumptive users or destroyers of the environment, we applaud the restrictions on these environmentally important areas.

The other three alternatives, being Alternatives B, C, and D, propose that off-road vehicle use be "limited" or "closed," depending on the alternative, and severely confine or completely prohibit access to public land. Proposed off-road vehicle use areas, as defined in Alternatives B, C, and D, permit land usage in only three main areas. These areas are defined in Maps 1-3 and 2-14 of the Draft Resource Management Plan. T-5 All three of these major areas are: 1) remote from the Albuquerque area; 2) use of these areas is contested by the BLM grazing permit holders and local Indian tribes; and 3) all three of these proposed areas are liable to be lost to off-road vehicle use through: a) acquisition by local Indian tribes; b) implementation of use permits for oil and gas drilling or coal stripmining; or, c) BLM woodland management or proposed Wilderness interim management areas.

To be specific, the first off-road vehicle use area, which lies west of State Highway 44, between San Ysidro and Cuba, has approximately 100 miles of existing roads and trails designated for off-road use, but is threatened by plans outlined in Map 3-1, oil and gas drilling, Map 3-2, coal stripmining, Map 3-3, paleontological study areas, Map 3-5, potential woodland management areas, and Map 2-6, proposed wilderness interim management areas. So, for this first area, the BLM staff holds in one hand an off-road vehicle use area and in the other hand, the proposals to take it away.

The second off-road use area is a small, remote area north and east of the Jackpile Uranium Mine at Seboyetta, New Mexico, and contains within its border a uranium mine believed by use to be Kerr-McGee Number 3. This off-road use area is described in Map 2-9 of the Draft Plan, and is known as the Competitive Dune Buggy Event Area. The limitation on this area is the very probable acquisition of this land by the neighboring Indian tribes, which also restricts all access to this area, except by a long and circuitous route, which still has to cross two miles of privately owned land for which there is no access easement at this time. T-6

Also, the BLM restricts any road modifications or widening in this off-road vehicle area, which restricts the roads to one-lane trails, thereby prohibiting the passing of slower vehicles during a race, which reduces a race from a competitive event to simply high speed touring. So, again, the BLM offers a carrot in one hand, and holds a stick in the other.

The third major off-road vehicle use area is the most remote from Albuquerque. It lies south of Grants in Cibola County and is bisected by Highway 117. By comparing Map 1-3, which designates proposed off-road vehicle use areas, with Map 1-2, which delineates proposed special management issue areas, it is clear again, that the BLM staff offers an off-road vehicle use area in one hand, and the means by management proposals to take it away in the other. T-7 It is obvious that management proposals B, C, and D, are not only ineffective management proposals from an off-road vehicle standpoint, but are duplicitous shams of off-road vehicle use offerings, which are in truth, off-road vehicle lockout plans to promote other land use plans at the expense of all potential off-road vehicle and recreational land users.

As a summary, I would like to reiterate the important points I have expressed. We are a family-oriented organization of solid citizens who do not engage in, or tolerate wanton destruction of the environment, cattle rustling, vandalism of property, or illegal wood cutting, either expressed or implied, and we do not see ourselves as consumptive users, for to us, consumptive users are: 1) range cattle; 2) oil and gas drillers; 3) uranium miners; and 4) coal strip miners.

We do not believe off-road vehicle use results in the decline of vegetative vigor, productivity or ecological conditions. We unanimously and wholeheartedly endorse Alternative A of the Resource Management Plan and believe it to be the only legally and morally viable option, and we refute the desirability of the offered off-road vehicle use lands in Alternatives B, C, and D, as shallow and duplicitous cover ups of the real and intended land use options the BLM has planned for options B, C, and C.

Thank you for your time and attention.

BLM PANEL: Yes. Did you understand ORV to refer only to recreation use, rather than all motorized use? Is that how you understood the planned use?

T-8 MR. JOHANSON: Yes, that was what we felt was the intent.

BLM PANEL: That it meant only recreation use, rather than all motorized use regardless of purpose of the user?

T-8 (cont) MR. JOHANSON: Yes.

BLM PANEL: That's the premise on which you made your statement?

MR. JOHANSON: Um-hum.

BLM PANEL: You made a statement about how the proposed ORV trails would be threatened by other uses. Could you be a bit more specific on how those other uses might threaten that trail or the use of that trail?

MR. JOHANSON: I don't have the maps with me, but I believe I can look back in my notes and find the place and then I can speak to you about it with the map that's here.

Okay. Basically, there are three off-road designated use areas, and I believe that's Map 2-14 in the book. They are this yellow area up here bounded by the red, which is San Ysidro is about here, and Cuba is about here. The second area, which is called the Competitive Dune Buggy Use Area, is a very small section of yellow right here at the county lines, Sandoval, Bernalillo, and Cibola County, right where they come together. This area is the competitive buggy area. The third major area we talked about is the area+below Grants, which is this yellow area down here bordered by the Indian reservations on either side.

Initially, in the first -- we call this the first off-road vehicle use area in our statement, and the maps in there, which are Maps 3-1, 3-2, 3-3, 3-5, and 2-6, cut this area up into various uses. Basically what it is oil and gas drilling removes the center portion in a long diagonal from east to west for coal and oil drilling permits. Coal strip mining also takes out the lower center area of this on map, shown on map--I keep losing may place--3-2. Map 3-3 is the paleontological study area, and that takes care of the upper, right-hand portion of this area. Map 3-5 is the potential woodland management area. It is the lower, left corner of this section, and Map 2-6, proposed wilderness interim management area, is also the lower, left portion, and almost in all of the lower portion of the area.

If you examine those maps in reference to 2-14, you will see that this area, which on a large overlay, provided to us by the BLM which shows all the roads that are currently available, is nearly completely restricted by management plans or use permits, which would be issued under other alternatives.

The second one, this small area at the county line, is threatened by access from the Indian tribes. It is also very difficult to access. It requires a long and twisting route to get there. Right in the middle of it, the only area that is available to use for us is the upper, left-hand corner of this area, and right in the middle of it sits a uranium mine with the tailings piles indicated to us by the BLM as being highly toxic. And we have a six-mile loop with this uranium mine sitting right in the middle of it. T-9

The problem with this area designated as the off-road vehicle use area, again, is that we are not allowed to modify existing roads and trails. So, we are able to get a six-mile loop for a lap, but we are unable to get any place on there to pass. We also have to go through about four or five fences to use it through the gates and the fences. And we feel without modifying the roads for passing conditions, that the area is unacceptable as proposed.

The third area is this area down here south of Grants bisected by 117, and this area has--let's see, where am I? Okay. There is a management use option by the BLM for this area. I believe it's an interim wilderness management area, which if implemented, again, would restrict all off-road vehicle use to almost the entire area. It is a smaller -- the interim wilderness management plan area is smaller than the existing off-road use designated use area, but it so restricts it as far as internal road structure that it makes it useless to our needs.

So, basically, that was the explanation or the theory behind the three area comments.

BLM PANEL: You feel things like oil and gas, and fuelwood cutting and coal are entirely incompatible with your sport in the same area?

MR. JOHANSON: The reason they're incompatible is that I have talked to people. I have talked to PNM coal mine, the strip miners outside of Gallup, and they have said, any land use permit they get, their internal corporate policy plus their insurance policies restricts any people from using that land once they get a permit. I have talked to Shell and Phillips Petroleum at drilling sites in the Abluquerque area and in the the Elephant Butte area, and they had said the same thing. Once they get a permit to use the land, their corporate policies and their insurance company policies state that nobody else can use the land while they hold the permits, because of insurance and, you know, possible lawsuits and things like this.

So, if these permits take effect in these areas that are proposed, then we are unable to use the land.

BLM PANEL: Were you aware that your club identified that dune buggy area initially as a desirable site to be explored?

MR. JOHANSON: To be explored, yes, the site is not undesirable. The problem with its desirability lies in basically three areas. The question of access, of which there is none at this time, no legal access. The time that we went there and toured it, we discovered at a later date we were very much in illegal standing. We had crossed the Indian land without their permission and not known it. We had crossed the rancher's land and asked them afterwards. And we had been in and out of the uranium mine property and they were somewhat upset about it as well.

The second problem with it, of course, is the fact that the management plan states that there is no modifying existing roads. So, the road structure is such that we cannot use it for a competitive event unless we modify it so we can pass in areas, whether we can pass in any area, or whether we have designated passing areas, we need something like that to be able to use the road structure.

The third thing is basically a safety condition, which is concerned only internally within the club, the fact that it is 65 road miles from Albuquerque. In the event of some racer having an accident, there's just no way we can get them to Albuquerque hospitals in time, you know, for reasonable treatment of a serious condition. And its remoteness was the third thing that we objected to. Otherwise, we considered the area to be potentially beneficial to us, if we could work out something to handle the three criticisms we have.

MR. DAVID WEINGARTEN: I'm David Weingarten. I'm representing the Albuqueque Wildlife Federation tonight. I wish to speak in favor of Alternative B, Resource Conservation, because this alternative places primarily emphasis on maintaining or improving important environmental values. We would like to see the management direction changed so that the identified issues are resolved in the manner that places highest priority on the improvement of the Rio Puerco Resource Area for wildlife and watershed.

If the area is to recover from past use, we have to expect a change in some current uses. Now is the time to do it. Thank you.

MR. ARTHUR COLGATE: My name is Art Colgate, and I represent the New Mexico Off-Road Vehicle Association. This is an informal group made up of the various off-road vehicle associations, the three-wheelers, the four-wheelers, the dune buggies, the Trial Riders Association, and the Southwest Off-Road Racing Enterprises, which does the "Oh-My-God-100."

I've only been riding motorcycles for about two years in the desert, and the rides basically consist of long rides, betwen 50 and 100 miles, one pass type travel. Rarely do you sit in one area and tear it up, like some of these areas around Albuquerque, which have been purchased for this purpose.

And when we learned of the RMP study intending to limit this land to existing roads and trails, we formed the Association to ask the question of the group, the presidents and the board members of these groups whether they would like to see this happen. Unanimously they said no. They felt that restricting off-road vehicles to existing roads and trails was essentially an elimination of the sport. We then organized some letter-writing. The BLM received over 200 letters protesting their intended management change. And when the Plan came out, we didn't see any acknowledgement of these desires.

Let's see. How to do this. We feel that for the BLM to do this in light of the historical fights of off-road vehicles on public lands, this is a little out of date with what is happening in this country. In California, initially, there was big surge to protect everything, to put everything in extreme wilderness categories, and the fights to regain a very small fraction of public land for off-road vehicle use has been long, painful, and expensive, but they are winning them back.

I would primarily like to say that up to now, there has been no environmental impact, consumptive or otherwise. With some of our original meetings with the BLM, when we learned of their intended management change, we said, okay, let's practice this like you do the cattle grazing. Let's put it under management, i.e., we belong to groups that they can contact and send newsletters to, and that when the land, a certain section of area, desert becomes abused or it shows signs of degradation by this off-road use, that we put it under rest-rotation use, which is a dialog of the ranching industry.

It seems ironic now that just when Albuquerque is really beginning to grow outwards and overusing certain private lands, such as the West Mesa out at Southern Boulevard for off-road vehicles, that by now coming along and taking just the better part of a million acres and saying, boom, no more off-road-vehicles off the road, seems really out of keeping with what is necessary for the public for recreation.

In the Plan, it's also been insinuated that the primitive recreationalists such as picnicking and backpacking is predominant recreation out there. At least that was my understanding from reading this document. I may be in error. We ride out there every other weekend in different sections, all the way from Cuba, the Continental Divide Area, down to the D-Cross Mountain south of Grants and the southern end of the Malpais. There's Forest down there. To date, we would say the ratio of off-road vehicle users probably is at least three to four times that of any other activities we see out there, including woodcutting or picnicking and hiking. In the desert areas, people are not going to get out of their car, hike a half a mile, and start fishing. They're not going to go backpacking out there in the middle of the day either. So, we feel that those arguments used against us to limit this recreational sport are really unjust.

And we would just like to see you include some areas where you would acknowledge this sport. It's a growing recreation. You will simply have more problem with illegal activities with people going off-road.

Like Blair said, that after a race, which is extremely heavy use impact, that there is essentially no detectable damage after reseeding. The only real environmental impact we've been seeing in this area is like Blair also said, the ranching, which is now much better under control, and of course, the extensive oil and gas exploration roads, which are long-term, heavy duty scars.

Let's see. Anything else. As far as it being an unsociable recreation causing dust and noise, I agree. If there is an area that is particularly moist or wildlife, then these areas should be closed to off-road vehicles, small limited areas. Other areas, essentially archeological sites, should be protected so people don't go driving over them. On all the rides we've been on, we've come across many archeological sites, and we've never driven over one. We've parked our bikes, if anything, and got up and looked at them. And some of our group is also into archeology.

I would also like to say that this Plan is not consistent with the other RMP plans in the State of New Mexico, that the White Sands Resource Area, the Las Cruces District, which amounts to approximately 1.6 million acres, the same type of battle started shaping up initially in that ranchers and some other people complained bitterly about off-roaders or hunters abusing things. The BLM then went out and monitored these accused allegations, and found that there essentially was no substance to them. I think this would also hold true for this area, that there has probably not been any significant number of backpackers or picnickers that have been displaced from their recreation.

T-10 They then defended this. They actually had to defend it against various groups that were fighting it. And they also put the dialogue into their Plan that says, if there is degradation, if there is use or environmental impact, then they will put it on a rest-rotation basis. And we proposed this from the first private meeting that we've had with the BLM, and there was essentially very little acknowledgement of this desire to do this type of management. T-10 (cont)

I guess that's about it. Thank you very much.

BLM PANEL: Did you also understand the term off-road vehicle to be referring only to recreationists, or to any motorized activity regardless of purpose?

Mr. COLGATE: Yes, I understood the uses of the word. I also understand the uses of the word as defined by the Federal Code 1601, that directs that the BLM is required to maximize the resource values. Now, associating the word historically, ORV is associated with recreational use. And for the BLM to try to recategorize this word to include any vehicle used for any purpose, and thereby ignore the off-road vehicle use, is a misuse of that term, and I protest that.

BLM PANEL: Are you aware that that ORV term comes straight out of the regulations and that it does apply?

MR. COLGATE: I do, and I also realize that you have to segregate between these distinctions, and that other BLM and other wilderness studies in this country are now segregating those distinctions. They are making distinctions between four-wheelers, three-wheelers, and motorcyclists, because each group has its own impact. And these areas are Georgia, Florida, California, Idaho, Colorado, just to name a few that are making the effort and the additional benefit.

The other advantages of becoming a group that you can manage is that we can also pay you funds, since you have to manage this land for the public, so therefore, we should contribute money for that management just like the ranchers do for their leasing fees, grazing fees.

BLM PANEL: You said that you used your club and your constituency as a frequent user of the public lands. Do you feel strongly that, with the growth of Albuquerque--I don't want to read anything into your statement--that that use is going to be increasing, that that demand is going to be there?

MR. COLGATE: I think it will be increasing significantly, and if the BLM does not create areas that they can put on rotation, that they will have a lot of illegal activities.

BLM PANEL: Do you have any feel for what significant means?

MR. COLGATE: Yeah, I think Southern Boulevard and the West Mesa will be closed in two years. And then we will start having frictions with the Indians and the ranchers, and then your illegal activities will greatly increase.

BLM PANEL: You do feel that the Rio Puerco might be a recipient of that of that displaced use than?

MR. COLGATE: Yes, and I would also like to see that it's used for that, since it is a nonconsumptive use that does rehab under 13 inches of rainfall out there. In the event that it doesn't, then go ahead and close it down. Until you can show that in an environmental impact statement, we're going to greatly encourage you not to do that.

MR. DAVID DELL: Hi, I'm David Dell. I'm a resident of Albuquerque, and I'm representing both the Sierra Club and the New Mexico Mountain Club. I'm just going to be very brief and general and just say that we do not support open access to all the range lands, but like some of the folks have indicated before, they are willing to stay away from some of the critical environmental, archeological, paleontological areas. We believe that there has to be a place for the ORV's and we're willing to have certain sacrifice areas set aside for them, but we do not desire open access. I believe Sidney Reid will stand up later on and make a further statement.

BLM PANEL: From your contacts, would you say that your group is a frequent user of these public lands, of our public lands?

MR. DELL: Now, both groups have, let's say, a dozen day trips or so into the area every year.

MS. SIDNEY REID: I'm Sidney Reid. My address is 1819 Arizona, Northeast. I've lived here in Albuquerque since 1958.

I'm here to represent the New Mexico Mountain Club. The Mountain Club is the largest outdoor recreation organization in New Mexico. We use almost exclusively public land, either State land, or BLM land, or National Forest land. Very few of our activities are into private land, although they are occasionally.

I know that one of our club members, Bill Stamm, who is a past club president as I am, recently handed into your Recreation Resource person a list of the trips that we had had into the Rio Puerco in the last 12 or 15 years, and I think he also gave you a total of the numbers of hikers, which probably runs into the hundreds. Am I correct?

We are primarily a recreational organization. However, we do have an emphasis on conservation. We strongly object to the use of off-road vehicles in areas where it is not essential for their use primarily for economic reasons, because of the needs of the lessees, such as the oil and gas people, the livestock lessees, or the lumber lessees. We'd like to see some of them out, too, but we know we're really fighting when we come down to that.

We do not feel that however well-organized and well-controlled these groups that you have heard from tonight already and will probably hear from again later. Granted, they are representatives, we're willing to concede, of groups who try to control what their members do. Nevertheless, you know as well as we do that if these areas are open to them, they are open to anyone who wants to come in with an ORV. They do have a very destructive effect on the range land. They do have a very destructive effect in the erosion that is left behind. It is not something that recovers in a year of good rainfall. One set of tracks can be there 25 years later in the form of a 15-foot deep gully. And quite aside from the recreational aspects of the use of this type of vehicle off of maintained roads, they do have a very destructive effect on the range land and on the watershed, which in the desert country is very fragile, and can take hundreds of years to recover.

This is public land. Granted, it is to be used for multi-purposes uses, but to simply let it lie open to the irresponsible use of people who want to go out and race at 65 miles an hour to see what dune buggy can pass what dune buggy is a serious and irresponsible misuse of public land. And I think before you permit these very fragile areas in the Rio Puerco Management District to remain open to this kind of use, you've got to take a very hard look at what's going to be down the line in 20 and 30 years. There is overuse now that to a very great extent is out of your control, by the oil and gas lessees and by the livestock lessees. Don't make it worse by permitting the indiscriminate use of the ORV vehicles. I had one for eight years, and I never saw any reason to take it off a maintained road to get my recreation. Thank you.

BLM PANEL: Do you have an alternative that you think should be sanctioned?

MS. REID: Well, okay, let me tell you, I've been laid up in bed with this bad condition and with shingles, and it was only the night before last when I was asked to come testify at this meeting that I got my act together. I haven't read this thoroughly, I don't think, in about two months. I think in all probability, if I had to go back and read it now, I would probably agree with Mr. Weingarten from the Wildlife Federation that it would be Alternative B.

MR. CORRY MCDONALD: My name is Corry McDonald, and I come from Albuquerque. The comments on the Rio Puerco Management Plan are few. I would like to make some orally tonight, and I will give you some written comments that come from the New Mexico Wilderness Study Committee.

FLPMA specifies the activities considered to be disqualifying are not to be allowed on the WSA's. Another way of saying it is that the Federal law which was brought to bear on the BLM and gave them finally an organic act to follow said that BLM was supposed to look over the nation and look over the roadless areas and pick out of them areas that might be considered for wilderness study. And so, it's based on the law requirement that we're talking about roadless areas. And off-road vehicles use roadless areas, and we're going to have them for some time.

A lot of people have made investments in them, and they no doubt have to have places to use them. There are many other aspects of the Management Plan that I think we want to comment upon. This not only applies to ORV use, but road building excluded from WSA's, Wilderness Study Areas, firewood cutting, P-J cabling, range modification, open pit mining, and even shaft mining, and oil and gas drilling, which will not establish permits and/or develop leases prior to the Wilderness Act cutoff date, and that was about a year and a half ago. This comment applies to all options, the A, B, C, and D options, and must be applied because that's the law that binds you.

Signing of exclusion areas is not addressed, and yet it's a management means that you have to use to advise the public, and, back to these signs, there are certain restrictions, like you can't use ORV's, or you can't drill, or whatever the restrictions are have to be on the signs or the public doesn't know about them.

The Wilderness Society will make a written statement to this effect during the public comment period, and this will come from the national organization with thousands and thousands of members in agreement with the statement.

The second item, there is a national law pertaining to public utility corridors, which covers far more than the power transmission lines that you mentioned in the report. It includes public roads. If it's a public utility, it goes in a corridor. It includes highways, railroads, pipelines, for whatever purpose, and all other public utility distribution means. Corridors shown in the RMP may be optimized for Four Corners to Albuquerque transmission line route, but how about the other uses? Your congressman can get you a copy of the law, and it ought to be studied and incorporated in the Management Plan, because it's a good law. It's too bad it wasn't enacted earlier when we were building the railroads and the highways. In any event, the intention of the law was to eliminate a spider web of different kinds of right-of-ways spreading all over the countryside. And you can imagine if you want to bring a gas line some other place than a power line, you put two separate rights-of-way in. Correspondingly water lines, they all go in their own directions. The trouble is, we can see them in the desert. This law isn't as important in the Middle West where it is covered by greenery.

The third item is range management. The practice is to reduce the overgrazing. We're thwarted by the lawsuit that Watt promulgated before he was appointed Secretary of Interior. He represented the Rocky Mountain Legal Foundation, and they did lean on the judges in the case. I'm not recommending doing a careful dance around such a court decision, but I am encouraging you to apply the best land stewardship you can be capable of. Alternative B might not be the best amenable plan option to accomplish this objective, but you have to find one that is.

In general, Alternative B is preferable, but it can stand quite a bit of touch-up improvements, and we will mention some of the things that we think ought to be included as we provide our written commentary.

The fourth item is just a little note in passing, the Continental Divide Trail isn't a trail yet. It's going to have to be built some day. It's location is going to have to be set along. The big problem is drinking water. All the available drinking water is owned privately, and I would suggest that the BLM put in a Management Plan an acquisition process of enough drinking water to support the users of that Continental Divide Trail.

There are other comments that will be written. Finally, there are other features in the report that should take a great deal of study by the public, other than just the ORV use. Admittedly, there are many of us that don't like to see our prime country torn up, but we do like to see provisions made for appropriate use, no matter what kind of competition it is, to do it under controlled conditions, and not end up with just this huge area, just a latticework of trails that are started by one or two passages of reasonable speeds by off-road vehicles. Thank you.

MR. SCOTT JACKSON: My name is Scott Jackson, and I represent Earth First and I live in Albuquerque. I only found out about this meeting today, and so I haven't really prepared a speech or I haven't really read the book or anything like that, but I would like to note how the general Earth First feels about land management in general.

We have no proposal on paper, in other words, on how we would like to see these lands used, but basically, we feel that wild plants and animals and other types of natural forms are the only true and moral users of this land. And that we should do all we can to let them give us the laws and to follow their example on how we should use these lands. Nature is the top priority in using these lands, and it's very difficult to see what plants and animals and the earth wants us to do with this land when we're involved in being in any type of motorized vehicle, whether it be on the road or off the road. Of course, I think off-the-road vehicles are a lot more damaging to what wildlife is there.

Or if you're economically involved in extracting valuable minerals or metals from the earth or if you're involved in letting cows graze on these lands, so that we can be well fed, or if you're involved in building condominiums on this land so that we can have more places to live.

As I said, my speech wasn't prepared, so I really can't say much more than that, but I think we should follow the lead of nature rather than following the lead of our own economic greed and luxury. Thank you

MR. JAN CUMMINGS: I'm Jan Cummings, and I live in Corrales, and I'm just going to -- I wrote a brief statement up yesterday to read. It's personal, so I'll just be speaking for myself.

For over 24 years, I've been hiking in the Rio Puerco country to get a break from the noise and congestion of Albuquerque, to get away from the marks of man. As the years go by and the city grows in population, of course, there are more people driving the back country. So, I have sought out the BLM Wilderness Study Areas to get away from vehicles, as they are not allowed there, but even in the Ojito Wilderness Study Area, for example, I find motorcycles and miles of motorcycle tracks. Some of them on slopes, I notice, are expanding into scars and gulleys with each shower. There seems also to be some percentage of riders who will leave the road and drive across country, leaving their lasting tracks in what was one of the last trackless areas. That's it.

MR. JAMES LEWIS: I would like to see this area kept as wilderness. I think that off-the-road vehicles will destroy it. I believe there should be some areas set aside for off the road vehicles. On the Tijeras Canyon near Albuquerque, there are scars where the off-the-road vehicle people have chosen the routes that they might take, and they like the curves and everything. And since they are already ruined, why, we could set those aside for off-the-road vehicles and keep them out of the Rio Puerco area. Thank you.

BLM PANEL: Could you in any way be more specific on how you think the off-road vehicle or motorcycle destroys?

MR. LEWIS: Well, they've ripped up the soil, and the plants and the animals don't have a chance. And they just allow the area to deteriorate. So, I think, they should be allowed only certain areas, and certainly not Wilderness Areas, because they're not interested in the Wilderness because they wouldn't be driving this machine that makes too much noise and destroys the Wilderness.

MR. COWEN COLLINS: Thank you. I'm here representing primarily myself and maybe a couple of points of view.

Looking at small areas relatively circumscribed that still have a potential to remain or regain the wild status, I think, is a very important part of the State, its beauty, the general flavor of living in New Mexico. The desert is one of the more fragile environments in the world, maybe seconded only by the irony of the tropics, as a very fragile environment. Recently I've been down to Panama where I've seen the results of neglect of some of the environmental standards where there's been damage to the land that nobody knows how to predict whether it will ever recover.

If I'd been notified sooner, I would have been better prepared to review some of the introductions, like Gould's book on grasses that covers some of the tragedies of the 1800's where over-grazing destroyed so much land and the current status of lands in Arizona and New Mexico reveal that recovery takes a long time. It's a difficult process, much negotiation.

The issue of off-road vehicles is mentioned frequently. For a time, I enjoyed that, but personally found it quite in conflict with my other interest of searching for solitude and a wilderness experience where nature reigned supreme. I think Corry McDonald mentioned several of the mandates the law has that have to be followed, and I agree with those.

One of the troubles I find in having a certain area that might be set aside for something like ORV's, one of my frustrations when I was riding my dirt bike at that time around some of the roads of the Mescalero Reservation is that I found it in conflict with being in the Wilderness. Also, as I walk through Wilderness Areas, I'm more familiar with some of the scars left on the hills in the Carson, which erode into gulleys and then erosion is a major problem. And given a small area, the whole area tends to get used over and over. And one of the frustrations might be like on my other interest, bicycling, is that oftentimes things are set up so you are going around and around in small circles. I think off-road vehicles do represent a challenge of man, machine, and country, but that as I was riding, the idea of silence and solitude were not necessary to be on some rugged terrain and also to have the possibility of getting someplace. I think, long narrow trails that are in areas that are far removed from wilderness centers, areas that already have damage, where noise isn't going to bother the wilderness, where the destruction of the trails made by off-road vehicles isn't going to lead to extensive erosion, that may serve as lengthy trails so the challenge is getting from place to place. So, there are routes around the State, that might be very satisfactory for off-road use to be designed.

These areas are circumscribed, and it's recently been on television that these are unusual and special areas, and the type of desert environment promises to yield information that we still don't have the technology to understand. And as starvation in Ethiopia and aridity and desert threatens life in most of the world, we're a country with the resources and the technology and we still have the habitat that we have to understand if we're going to be of further service as a State to the rest of the world. Thank you.

MR. MICHAEL ARMIJO: My name is Michael Armijo. I stand, I guess, the only person here standing for the rancher. I hear all these other people representing their clubs. And I don't see how--you know, everybody is out for themselves. They want to have a little bit of fun. What are the ranchers supposed to do with their cattle? How are they supposed to get their cattle down from the mesas, down from the mountains, when all of these buggies, motorcycles are running their tracks?

That man right there, Dave, I believe he should be up there on the panel because he is out there, and he knows what the land looks like. Like this gentleman said here, his club is one big family, all right. A rancher has his family, has his life, without them the cattle. He makes his money, his living, that's the way his life is.

You get these people coming from out of town, out of where in the hell they come in, riding their bikes, tear up the land. They say, well, we'll reseed it and it will go back to original. The water out there is not like it is here or towards the east. When it rains, it rains three weeks, a month, three months later. Okay, you throw seed out there, that seed will probably burn up and blow away before it ever comes back up. And to this day, I can show you in two or three years ago that they've had them races up there, I can see those gulleys made from the track coming up and going up the hill.

You know, people want to save the land and everything, and you know, they say cows tear up the ground, they over-graze it. The reason they over-graze the land is because there are fences and they're fenced in one place. Just like the motorcycles. They race in a certain area, they're going to tear up the land worse, because a cow doesn't spin its tires and it doesn't, you know, mark up hills.

I'm not saying that everybody who's out there is cutting wood, tearing up the roads, you know, and harassing cattle. But for that one that does, everyone is going to have to suffer for it, right?

A few years ago they were going to cross through my land. I had a permit out there. And they brought us in for a hearing and all, and they didn't cross our land because we didn't let them. And if every rancher would stand up and not let them go through, they will not cross. I don't care if you go through courts and eveything, they will not cross, because every rancher pays for his lease, right. Okay, why does he pay rent on that land? So he can have somebody else come in there with their two or three hundred people and jump all over it. He pays to take care of his cattle, to graze his cattle. The BLM tells us now, we're supposed to take care of our fences, we're supposed to make sure that the place isn't over-grazed. Why in the hell are they letting those motorcycles come in?

I'm not saying that everybody cuts fences, but the fences I have found is more cycle tracks and four-wheel drive tracks. I don't know if it's the Indians, or hunters, or whoever does it. And I'm not -- but, you know, like I say, for one bad person, everybody is going to take the blame. And I think it's bullshit that these people are saying that motorcycles -- it just pisses me off, because they don't realize that people are out there trying to make a living, and these guys just want to go out there for fun and tear the place up.

MR. STEVE WALDECK: My name is Steve Waldeck. I live in Albuquerque, and I ride motorcycles, so I'm primarily interested in ORV use in the Plan. Reading over the Plan, it sounds like, from the way I've read it, that the Plan basically is protecting the land from overuse by different groups of people. I happen to be one of them by being a motorcycle rider.

The problem that I see with most of the Plan is, we are becoming larger and larger, whether people like it or not, the ORV use will become larger and larger and we need more land. We need more established trails, and we need to have some kind of Plan or growth so that we know how to help you manage us.

Looking over the meeting tonight, it seems like a lot of the people here are one-sided, and I guess I'm one of those one-sided people. But it seems like the people who have the most land, the people, the hikers that can use all the Wilderness Areas, they're not satisfied with what they've got, they've got to have more. The ranchers, I can sympathize with the rancher who's got a problem with motorcycles chasing his cattle, but I personally have never done that, nor have any of my friends done that. If we are running his cattle to death, that would be a different story, but I don't think we're using enough of his grass when we cut across there that his cattle don't get to eat what they need.

Maybe I'm wrong. I'm not a rancher, so I wouldn't know, but it just doesn't seem like we use that much of the land. We want to go from point A to point B. We don't like to go around in one little circle. If we did, we might tear up a lot of land, but we don't do that.

If there's been a study on that, I'd like to know about it. I know there was a proposal in the California Plan that was shot down because there was a lot of misnomers in there about animals being scared off, wildlife being ruined, lizards being deafened by the sounds of motorcycles driving by, but all of that was really just a -- I don't know who came up with it, but it was shot down in the courts because of that kind of -- I don't know whether it was a direct lie, or whether it was somebody just trying to taint their side so they could get their way with what they were trying to accomplish. But there isn't really, that I've heard of, any study that shows that wildlife is hurt, the wildlife will have to move from one area that they lived in to another because of ORV use, and if there is, that type of Plan that you have right now should show that in there. But there is some kind of correlation between man's use of off-road vehicles and the animals in the environment.

So, unless that is put into the Plan, does that need to be brought up in a meeting like this? I don't really think it does, unless it is a valid point. The only other thing I have to say is that when we have one designated area that's called a sacrifice area, what--I mean, you're telling us right now, this is an area that we sacrificed to you, tear it up. That's not what we want. We don't want to tear up the land. We want to use the land and manage the land. We need an area that we can ride big enough to where it keeps everybody happy, not so big that it can't be managed, but big enough to where it does not make an environmental impact, because of overuse in that one area.

Albuquerque is growing. It's going to continue to grow. There's going to be more ORV use. We need some way to have an outlet for that ORV use or outlaw ORV use at the legislative branch, not the management level of the land. But, I mean, if we're not allowed to ride those bikes, that's a different story. But if we are and they can sell them, you've got to plan for that. You've got to give us more land. You've got to plan that we're going to need more land year after year.

BLM PANEL: You're riding on the existing roads and trails. The existing roads and trails as you have seen do not meet that recreation need?

MR. WALDECK: Yes, it does, but I don't believe that Plan A is going to be the one that is going to be pushed through. If Plan A is, that would be fine. But even with Plan A, there is no more trails planned for that area. A small amount, I should say, there is a small amount. But if there is hiking going on in that area, and that use will be greater over the years, too, then we're going to need more than just 12 or 14 or 50 miles of trail planned in the next 15 years. We're going to need more trails that would be designated just for motorcycles. I would like to see more understanding between the people who hike, ride horses, and use ORV's. If everybody would understand each other's needs, maybe it wouldn't be so one-sided anymore. I don't want to see the hikers cut out of there, but what would happen if this meeting right now was about cutting out hikers in that area. People would swarm in here, how dare you take out my right to hike. Well, that's how I feel about my ORV. I feel like I have that right.

BLM PANEL: None of the options as you reviewed them adequately meet your recreational needs for off-road vehicles? You'd like to see --

MR. WALDECK: I'd like to see more. That's all I'd like to see, more planning in trails.

BLM PANEL: You stated that you feel that your constituency or the recreational off-road vehicle user is getting larger and larger, and that's a trend that you see continuing. Do you have any feel, say in the next ten years, do you think that's something that's going to double, or do you think that, you know --

MR. WALDECK: I could get you those figures. Bobby J's Yamaha showed those to me one day, and had a graph of how it's growing, motorcycles and three-wheelers, and now the newest thing is a four-wheeler. And those would show that there is growth and the average right now, I believe, is somewhere around seven percent per year growth, which is a high growth. So, one thing that I don't know if this would be in order or not, but there's a lot of people here.

MR. HAROLD HART: My name is Harold Hart, and I live in Rio Rancho. I came out here in 1977, and back in those days, I used to go out Southern and climb the hills out there. There was very rarely individuals that went with me. There were no trails. And I wouldn't want to go out there any more because I've seen the traffic going to and from the hills. You hear more if you go on foot and look and listen, instead of listening to the noise and exhaust of the vehicle plus the tearing up of the land. Walking doesn't tear up the land. This happened on Long Island, so it happened on Long Island, the very same thing. They allowed off-road four-wheel drives to go down at the end which was a permanent barrier, but they destroyed it. Now, I see the same thing happening out here and it gets worse and worse.

I feel that off-road vehicles and the trail bikes should be confined to very definite areas. Or even especially four-wheel drives--they should be outlawed because the main purpose of a vehicle like that is to get through a difficult area in Africa or even in this country where the trail is remote, but like Rio Rancho now, there with the -- of course, that's Rio Rancho. That's owned by Amrep, that's privately owned now. But they go everywhere there. And this gets bigger and bigger and bigger. There's no limit to it. There should be a limit to it. Thank you.

MR. CELESTINO CASAUS: My name is Celistino Casaus. I'd like to say a few words. I am into ranching. We run a small ranch up by the Cuba area, and I think that everybody has to kind of realize that we make our livelihood and it's hard on us. The BLM doesn't make it easy, and I can see their point. You know, they've got rough times. They need to answer to a lot of people who don't come out here. They don't look at the areas. They see figures and they make a lot of judgements on those figures. And I can see their part of it. And I can see a lot of people's part. I can see your part. I've got a four-by-four, and I like it once in a while and get out there. And I know my four-by-four tears up the land, because I've done it enough times and I'm the only guy out there. And it does tear up the land.

You know, it takes a long time, this lady is right, it takes forever for that land to recover. This year has been one of the best years in the last twelve years we've had out there. We've got more grass than -- you know, my dad's seventy-four years old, and the tells me this is the best year he's ever seen in seventy-four years. And it doesn't have anything to do with the BLM. It doesn't have anything to do with ranchers. It doesn't have anything to do with the ORV's. It's just the rainfall.

And I agree that you've got a right to that land, but so does everybody else, and we're talking about people who make their livelihood off of it versus people who just are enjoying recreation. You say you want to have all the use for all the land. That's neat, but across time, there's all the perfect roads and you're going to destroy all the land. Just like if they had not stopped the cattlemen from over-grazing, they might have destroyed it. Okay, they took it and backed off their herds. They saw what was going on. They waited for the good years, and now they're trying to recover from that. You know, I may not work here on a flat salary, but if they came out here and they told you you had to cut your salary by 30 percent, you'd really scream, and that's what they did. They went out there to the ranchers and they said, you're going to cut your herds. You're going to reduce them so that the land will come back and recover. You know, it was tough. They did it, they went out, and they cut their herds, and they made it. You know, you go out there now, and I don't care what anybody says, you can't say that land has been better in the last 100 years out there in the Rio Puerco area. You can't.

I've been out there all my life and I know it. My dad has been out there all his life. That land is coming back, but you can destroy it. You can destroy it in a split second of too many people getting out there and destroying it.

Again, the only thing I would say is, for all the people in recreation here, you're talking about a guy who makes a living out there. I mean, it's a living for him. He has to pay his hills just like you do. You wouldn't take a cut in your salary, and that's what you guys intend to do. When the wildlife people came on, they said, you know, wildlife is starting to disappear. The BLM, I guess the BLM, I don't know who did, they came out and they must have put at least 200 antelope. My herd has been cut back, and I'd say, now it's probably 100, somewhere in there. But it's not going anywhere. And the hundreds that died, I'm sure, were killed either in hunting season or poached, but not too many hunters -- I mean, not too many of the ranchers will go out there and kill antelope because they don't need to. They don't need that kind of meat. They've got their own meat.

So, it's not them that's destroying the wildlife, and it's not the rancher that's trying to destroy the land, either, you know. Once they maintain a road, they try to maintain it and hold to that road, whatever they have to do to keep on it. And I don't see why anybody else can't either. There's a lot of roads out there that I sure wouldn't take my car on, you know, they're already established roads. You don't need to cross unestablished areas. The roads are rough. They're bad roads. You want to take your ORV and go out there and take on some of those roads, that's cool, you know, just stay on the road that's established.

I don't see why you have to tear up the land. Thank you.

MR. TOM GLASS: My name is Tom Glass, and I live here in Albuquerque. And if anything I'm an avid off-road user. I have owned motorcycles, three-wheelers, and four-wheel drives, and I also belong to this New Mexico Off-Road Racing Association. I'd just like to make a couple of points very briefly.

One is that we don't cross the lands when we go out and have a competitive event. We stick to a maintained road or an arroyo, and we don't see a whole lot of wildlife in those arroyos or out in the desert. We certainly don't go chase antelopes or cows.

When I bought my ATV in 1983, Honda had sold about 300 here in Albuquerque, and recently informed that last year they sold 1,000 three-wheelers here in Albuquerque. So, the growth rate of off-road use is increasing substantially. That's my only two points. Thank you.

BLM PANEL: You say you stick the roads primarily?

MR. GLASS: That is correct.

BLM PANEL: For recreation use, do you see any advantage, then, in leaving an area entirely open, entirely open across country?

MR. GLASS: As far as crossing the roads and such, I don't see any advantage in it. We don't cross the roads. We pretty much set up a trail or a track, as we call it, and we stay on that track. Now, whether it's a one--mile track or a 15-mile track, we stay on that track. We do not cross, no.

MR. ARMIJO: Excuse me. I'd like to address a question to you personally. If you do let these ORV's come in, will the bill at the end of the year for the permittee, will it be less, or is it going to keep going up as it's been going? Are we going to be able to stick in more cattle? Are we going to have to pay for that water that they're piping in from Mt. Taylor? Or is everything going down, because everybody is going in there and somebody is going to have to throw in, pitch in, because we're not taking all that on us. For the fence, are those going to come out of your pocket? Okay, you know, it's not right for people, the ranchers, yet they have to dish up the same amount of money for everybody else to go in, plus cut back their cattle.

MR. WALDECK: If you want to go to Elephant Butte State Park, you have to pay a users fee. Would that help for the ORV use? Do you think the ranchers would be in favor of us using departmental land if we paid a users' fee at the beginning of the season.

MR. COLGATE: Excuse me. I'm sympathetic to the environmentalists, everybody, ranchers. I grew up in this state down in Socorro. I'm a desert rat from way back. I've only done off-road vehicles in the last few years. I used to walk everywhere. That's why I'm so tall.

Anyhow, we went to the BLM and said, look, okay, you're thinking of doing this wholesale limited status. Well, look at some areas. We picked an area we call the Cuba Greenbelt, away from all the ranches, a little section up in the northwest corner. We picked a small section down by Mt. Taylor. We picked a small section down by Grants. We're talking less than five percent of the whole area, maybe ten at the max. Nothing was included for motorcycles. They said there was this little five-mile strip outside of Cuba. It was always used, and they will probably continue to use it regardless of what went down here.

No provisions were made for us, and it really hurt. We were only asking for a tiny bit. We get out of your hair, they make them stay on the roads. Environmentalists want us to stay out of your wildlife area. We support, we totally support this, every wildlife, every sensitive management area. There are nineteen Wilderness Areas we supported, and there were twenty-one, twenty-two special management. And we said, we support those. We won't contest it. We won't do anything, but we will stay out of it, and then we'll just take limited areas. Nothing.

So, now you get this, because the BLM just decided. And I'm not for four-wheel drives. I think they do a little bit much. I think I'd like to see them stay on the damn roads.

MR. STEVE MASON: I'm Steve Mason. I live at 103 Spring in Rio Rancho. It seems to me, instead of giving all the land to motorcycle riders or all the land to the ranchers, maybe like a bunch of little kids playing marbles, let's split it up. That way, nobody has to fight. I left here five years ago and moved to Dallas, and as far as riding motorcycles, we had motorcycle ranches and you can't tell me that cows and motorcycles can't get along, because they did. They do. We rode on ranches down there with cows. We appreciated the place to ride. We appreciated the cows and everything else. And they didn't tear it up. The people that did tear it up didn't get a chance to go back. Maybe that's what we ought to talk about is splitting it up. That's about it.

Responses to Transcript Comments.

T-1 See the detailed response on ORV limitations at the beginning of this section for a complete discussion of potential impacts of ORV use in the RPRA. The "Oh-My-God 100" race takes place under very specific and controlled conditions designed to assure a minimum of environmental damage. These conditions are in no way duplicated by a totally open status, and therefore cannot be equated.

T-2 The Draft RMP refers to all ORV users, not only recreational ORV users. (See definition, page GL-5 in the Draft.) The document states that open ORV use would result in an expanded route system in the RPRA, which could readily provide new access to sensitive resources. This new access would greatly facilitate vandalism, illegal woodcutting, and harrassment of livestock.

T-3 The Federal Land Policy and Management Act (FLPMA) (PL 94-579) provides that "public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values; that, where appropriate, will preserve and protect certain public lands in their natural condition; that will provide food and habitat for fish and wildlife and domestic animals; and that will provide for outdoor recreation and human occupancy and use." There are no Congressional requirements that public lands be open to off-road vehicles. Since most recreational opportunities in the RPRA can be accessed by existing roads and trails, we believe this RMP has provided for outdoor recreation as required by FLPMA.

T-4 We are not sure what "internal BLM guidelines" are referred to here. As far as we can determine there is no BLM guidance or policy requiring consistency in any specific degree between BLM plans. The Rio Puerco RMP is based on the unique problems and opportunities of the RPRA, not those of adjacent resource areas, and, as such, is unlikely to be identical to plans for adjacent areas. The BLM's planning regulations (43 CFR 1610.3-2) require that "resource management plans...be consistent with officially approved or adopted resource-related plans" in the planning area. These regulations do not require RMP's to be identical or even basically similar to RMP's for adjacent areas. The RMP Team has consulted with Federal, State, and local agencies and Indian tribes to ensure that this Plan is consistent with their plans. To date no inconsistencies have been identified. These efforts are documented at the beginning of this chapter.

T-5 The implementation of "use permits" for oil and gas drilling or coal surface mining could impact ORV racing across public lands. Such impacts are anticipated to be extremely limited. In the case of oil and gas leasing, the issuance of a lease does not in itself preclude other surface activities such as ORV racing. While development of the lease through activities associated with drilling will impact other surface users, the area of restriction is generally limited to the drill pad, usually an area of two to four acres. Restrictions on access are imposed to ensure the safety of both the operator and the public.

In the RMP process, areas are brought forward for further consideration for coal leasing but no leases have been issued and no mining permits have been approved. If and when leases and mining permits are issued and a mine is opened, ORV use within the mining area would be curtailed but the lease area would remain essentially unrestricted except where safety became an issue. Substantial environmental analysis is required both prior to leasing and prior to approval of the mining permit. ORV enthusiasts will be afforded ample opportunity to express their views for or against mining during the leasing and permitting process. The area brought forward for further consideration for coal leasing is shown on Map 2-11 in the Draft. The area actually leased would probably be less than the 8,020 acres shown.

The Draft maps cited, Map 3-1 (oil and gas drilling), Map 3-2 (coal surface mining), and Map 3-3 (paleontological study areas), are not intended to reflect land use restrictions but are included in the document to show the extent of these resources in the RPRA. The maps portray the known distribution of resources and identify areas of concern to the mineral industry and the paleontological community. The RMP alternatives and the Proposed Plan are presented in Chapter 2.

T-6 The Proposed Plan recommends acquiring a right-of-way across approximately two miles of private land to provide access to the Dune Buggy Competitive Event Area. Providing passing lanes for a competitive event could be accommodated. The location of these passing lanes and other race details would be analyzed in an activity plan for the area.

T-7 Map 1-3 in the Draft delineates the public lands that were analyzed for the ORV issue. This map does not designate any ORV areas as "open," "closed," or "limited."

T-8 See the response to Transcript Comment T-2.

T-9 The uranium mine referred to is the Kerr McGee Rio Puerco Mine. This mine never went into commercial production; only a small amount of ore was removed for testing. The future of this mine is uncertain, and presently no mining activity is occurring. The spoil material surrounding the site is from the construction of underground shafts, and to the BLM's knowledge contains no hazardous mill or mine tailings.

T-10 The BLM gave serious consideration to developing a rest-rotation system for open ORV areas. However, we believe that this would create new erosional problems that would be difficult and expensive to reverse. The ORV "Reasoning" section in Chapter 2, the "Soil and Water Resources" section in Chapter 3, and the detailed ORV response in the beginning of this section discuss the reasons for the proposed ORV restrictions.

1

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VI
1201 ELM STREET
DALLAS, TEXAS 75270

JUN 2 4 1985

Mr. Herrick E. Hanks
Area Manager, BLM
Rio Puerco Resource Area
P.O. Box 6770
Albuquerque, New Mexico 87197-6770

Dear Mr. Hanks:

We have completed our review of your Rio Puerco Resource Management Plan and Draft Environmental Impact Statement (EIS). The Draft EIS evaluated four options to manage approximately 900,000 acres of public land and 2,000,000 acres of Federal mineral estate in central and north-central New Mexico, and selected the Balanced Management Alternative.

We classify your Draft EIS as Lack of Objections (LO). Generally, we have no objections to the proposed action as discussed in the Draft EIS. Our classification will be published in the Federal Register according to our responsibility to inform the public of our views on proposed Federal actions, under Section 309 of the Clean Air Act.

We appreciate the opportunity to review your Draft EIS. Please send our office one (1) copy of the Final EIS at the same time it is sent to the Office of Federal Activities, U.S. Environmental Protection Agency, Washington, D.C.

Sincerely yours,

Dick Whittington, P.E.
Regional Administrator

No substantive comments in Letter #1.

2

DEPARTMENT OF THE AIR FORCE
AIR FORCE REGIONAL CIVIL ENGINEER CENTRAL REGION
1114 COMMERCE STREET
DALLAS, TEXAS 75242

Mr. Herrick E. Hanks, Area Manager
Bureau of Land Management
Rio Puerco Resource Area
3550 Pan American Freeway, NE
P.O. Box 6770
Albuquerque, NM 87197-6770

APR 9 1985

Dear Mr. Hanks

Thank you for allowing us the opportunity to review the revised Draft Resource Management Plan and Environmental Impact Statement for the Rio Puerco Resource Area, NM.

We continue to express our support of the BLM in developing functional management plans for lands under its control. The Air Force concern for these management issues contains the need to retain use of existing and the establishment of future military flight training areas and routes which may traverse these areas.

Currently several Air Force air operations including instrumental flight training routes traverse a portion of the study in question. Although flight training areas, routes and airspace requirements of the military are subject to change and do change frequently, it is not anticipated that new routes will be established in the immediate future. However, if we do propose any change we will keep you informed.

Mission requirements, fuel costs and environmental constraints determine the decision to locate military training activities. Because of general aviation and population pressures, low level high speed flights are relegated to areas which are least accessible and sparsely inhabited. Therefore, we request that you give full consideration to how planning and management decisions made by your agency may adversely affect or restrict use of low altitude airspace by the military. The Air Force position on this matter is based on the high training and readiness values rendered by use of this low altitude airspace.

We are hopeful this information is useful in your planning. If additional information is needed, our staff point of contact is Mr. Raymond Bruntmyer, (214) 767-2514, or FTS 729-2514.

Sincerely

DON-MICHAEL BRADFORD, Capt, USAF
Director, Environmental Planning Div

Cy to: AF/LEEV

No substantive comments in Letter #2.

3

DEPARTMENT OF THE ARMY
ALBUQUERQUE DISTRICT, CORPS OF ENGINEERS
P. O. BOX 1580
ALBUQUERQUE, NEW MEXICO 87103-1580

REPLY TO
ATTENTION OF

June 28, 1985

Engineering and Planning Division
Planning Branch

Mr. Herrick E. Hanks
Area Manager
Bureau of Land Management
Rio Puerco Resource Area
P.O. Box 6770
Albuquerque, New Mexico 87197-6770

Dear Mr. Hanks:

The Bureau of Land Management's Draft Rio Puerco Resource Management Plan and Environmental Impact Statement have been reviewed in relation to the Albuquerque District's responsibilities for flood control and administration of Section 404 of the Clean Water Act.

The Albuquerque District is conducting studies to control flood flows and sediment that enter the Rio Grande from the Rio Puerco. The overall management plan proposed in the RMP/EIS emphasizes control of erosion and sediment production. This emphasis on watershed management contributes to the reduction of flood hazards, the stabilization of stream courses, the improvement of water quality, and the reduction of sediment loads. This management goal would increase the longevity and effectiveness of any regulatory or protective structures that may be constructed on the Rio Puerco or Rio Grande. The preferred alternative, likewise, emphasizes this management goal while simultaneously providing a combination of harmonious but diverse resources uses and considerations.

Discharges of dredged or fill material into waters of the United States are regulated by Section 404 of the Clean Water Act (33 CFR 32-330). Several types of activities described in the RMP/EIS may involve the discharge of dredged or fill material; for example, pipe line construction, coal mining, new road crossings associated with road expansion, catchments, roads and work pads for fluid mineral mining, range land improvements, and rehabilitation/maintenance of dams and water control structures.

Regulations at 33 CFR 330.5 describe nationwide permits which may be used for these activities if the nationwide permit conditions can be met.

A brochure describing the Corps regulatory program and summaries of nationwide permits for work in certain waters, minor road crossings, work involving less than 10 cubic yards, work on existing fills, bank stabilization, and utility lines are enclosed for your information. If any proposed project cannot be performed under authority of a nationwide permit, an individual permit may be required. Additional information regarding the Corps program, determinations, and maps showing headwater locations may be obtained from Ms. Jean Manger or Mr. Andrew Rosenau at (505) 766-2776.

The opportunity to comment is appreciated.

Sincerely,

Jasper H. Coombes
Chief, Engineering and Planning Division

2 Encls
1. Brochure
2. Nationwide permit summaries

Copies Furnished:

SWDPL-R

No substantive comments in Letter #3.

4

United States Department of Agriculture
Forest Service
Region 3
517 Gold Avenue, SW
Albuquerque, NM 87102

Reply To: 1920

Date: JUL 09 1985

Herrick E. Hanks
Area Manager
Bureau of Land Management
Rio Puerco Resource Area
P.O. Box 6770
Albuquerque, NM 87197-6770

Dear Mr. Herrick:

The Southwestern Region of the Forest Service has reviewed the Draft RMP/EIS for the Rio Puerco Resource Area. The proposed plan will not conflict with management of National Forest lands.

Sincerely,

James C Overbay
JAMES C. OVERBAY
Acting Regional Forester

No substantive comments in Letter #4.

FS-6200-28(7-82)

5

United States Department of the Interior
NATIONAL PARK SERVICE
SOUTHWEST REGION
P.O. Box 728
Santa Fe, New Mexico 87501

IN REPLY REFER TO:

L7619(SWR-PE)

JUL 2 1985

Memorandum

To: Area Manager, Bureau of Land Management, Rio Puerco Resource Area, Albuquerque, New Mexico

From: Associate Regional Director, Planning and Cultural Resources, Southwest Region

Subject: Review of Draft Rio Puerco Resource Management Plan/Environmental Impact Statement, New Mexico (DES 85/15)

We have reviewed the subject document and have the following comments.

We strongly recommend that the General Management Plan/Development Concept Plan and the Land Protection Plan for Salinas National Monument be fully considered in the development and implementation of planning for resource management in the Rio Puerco Resource Area. A reference is made to the monument on page 3-21, but the monument's management programs and emphases were not specifically considered in the development of the management plan. The staff at Salinas National Monument stands ready to work with you in defining the nature of cultural resource issues and to coordinate with other agencies, institutions, etc., in meeting and resolving concerns and issues. 5-1

We believe that additional research is required in this region to further identify cultural resources to ensure proper management. This opinion is also supported in the Forest Service/Bureau of Land Management draft Cultural Resource Overview of Central New Mexico. Nevertheless, the draft management plan for the Rio Puerco Resource Area adequately addresses cultural resource management concerns and indicates compliance with the Section 106 process as a continuing management responsibility.

The use of the Special Management Area (SMA) as a mechanism to protect significant cultural resources is commendable. However, it may be difficult to select a truly representative sample of significant cultural resources at this time since only 5.5 percent of the land area has been archeologically surveyed. A total of 3,000 out of 30,000 potential sites have been identified, and it is very likely that other highly significant cultural resource concentrations remain to be discovered and identified. Consequently, the designation of additional SMA's may be required in the future as archeological survey coverage of the resource area increases, and limits on the number of SMA's should not be imposed on the basis of present knowledge. In other words, the SMA should be considered a flexible management tool. A phased system of controlled sample surveys could be initiated to obtain more representational coverage and thus minimize future "surprises." 5-2

-3 The SMA for Cabezon Peak stresses the natural environment. No mention is made of the importance of the peak proper as a Navajo sacred site. Native American religious issues need to be addressed in this plan as a critical issue.

Fish and Wildlife comments regarding threatened and endangered species should be incorporated into the final plan.

Charles B. Hall

Responses to Comment Letter #5.

5-1 The General Management Plan/Development Concept Plan, the Draft Land Protection Plan, and the Proposed Environmental Assessment for Salinas National Monument (Torrance and Socorro Counties) were reviewed and considered by the RMP Team during preparation of our Draft RMP. The BLM toured the general Monument area and met with the Salinas National Monument Superintendent during preparation of the Draft. The reference to Salinas Monument on page 3-21 relates to interest expressed by the Superintendent in the potential acquisition of lands in the vicinity of Salinas Monument that might contain archeological or other resources valuable to Salinas National Monument. The lands which are identified for disposal may be used as "trading stock" to acquire important cultural resource sites for the Monument. The lands which are identified for further study for disposal in Table 2-5 were placed in that category as requested by Salinas Monument.

5-2 Although only 5.5% of the public lands within the RPRA have been intensively inventoried for cultural resources, the information from these intensive (Class III) inventories, coupled with the data from numerous other cultural resource inventories (Class I and II) and reconnaissance, has provided BLM with a good working knowledge of the RPRA's cultural resources. This data base was used in identifying and selecting cultural resource properties for inclusion in SMA's. Cultural resources included in the SMA's are not intended to depict a representative sample of the full array of cultural resources found within the RPRA; however, it is a start. The cultural resources classes, goal system, and use categories outlined in Appendix K in the Draft provide the framework to be used to identify a representative sample of cultural resources within the RPRA and, if needed, to justify identifying additional SMA's.

The BLM's continuing cultural resource management program (pages 2-20 and 2-21 in the Draft) provides the mechanism to ensure the appropriate protection for cultural resource properties. The Proposed Resource Management Plan also provides for the identification and creation of additional SMA's as warranted.

5-3 American Indian religious concerns about freedom to believe, and access to and use of public lands were not identified by BLM staff or the public as an issue during RMP issue identification. The BLM believes that American Indian religious concerns are adequately considered under existing resource programs and SMA's. All project and activity level plans will consider Native American religious freedom.

The text for the Cabezon Peak SMA has been revised.

6

NEW MEXICO DEPARTMENT OF AGRICULTURE

OFFICE OF THE DIRECTOR/SECRETARY
Box 3189/Las Cruces, New Mexico 88003
Telephone (505) 646-3007

June 13, 1985

03.40 ltr.hanks

Mr. Herrick E. Hanks, Area Manager
Bureau of Land Management
Rio Puerco Resource Area
3550 Pan American Freeway, NE
P. O. Box 6770
Albuquerque, New Mexico 87197-6770

Dear Mr. Hanks:

This letter is to provide comments on the Draft Resource Management Plan and Environmental Impact Statement (RMP/EIS) for the Rio Puerco Resource Area (RPRA). These comments are directed specifically toward the 123,300 acres of public lands in the RPRA which were not considered in prior grazing EISs (Rio Puerco, East Socorro, and West Socorro). Comments by this department on these prior grazing EISs have already been submitted to the Bureau of Land Management (BLM).

We recognize the effort entailed in the preparation of the Rio Puerco RMP/EIS and commend BLM for thoroughness in the development of management alternatives and the assessment of environmental impacts. In general, the RMP/EIS is organized, presented, and written in a clear and precise manner. Accordingly, the comments offered below are intended as constructive contributions to an otherwise professional document.

Detailed Comments

1. We concur with BLM in its decision not to consider the No Grazing Alternative. We have stated previously in our comments to BLM that such an alternative is infeasible, impractical, and not implementable. The reasons for this are adequately presented in the RMP/EIS.

2. We agree with BLM's decision not to select Alternative A (No Action) or Alternative B (Resource Conservation) as the agency's preferred alternative. Continuation of management under Alternative A would provide no solution to the escalating resource damages caused by off-road vehicles on public rangelands. These damages adversely impact not only livestock grazing but other sustained yield uses on public rangelands. On the other hand, implementation of Alternative B would result in severe economic hardships to livestock permittees and lessees in the RPRA (p. 4-27, RMP/EIS).

6-1 We object, however, to the implication that Alternative B is the exclusive conservation alternative in the RMP/EIS. Conservation of natural resources, as delineated in the Federal Land Policy Management Act (FLPMA), is based upon the dual principles of sustained yield and multiple use. Alternatives C and D meet these requirements. For example, Alternative C (Resource Production) is described in the RMP/EIS as consistent with "The principles of multiple use and sustained yield..." (p. 2-37). The major difference between Alternative B on the one hand and Alternatives C and D, on the other, is not that the latter are less conservative of natural resources but that the former is more preservative of them.

We do not believe BLM should consider or adopt an alternative that is not consistent with the principles of natural resource conservation as represented in FLPMA. Therefore, we recommend that BLM differentiate among alternatives according to the emphasis on, or allocation of, resources within a specific alternative (i.e., wildlife, grazing, recreation, mining, etc.) and not on an arbitrary conservation denotation. If an alternative is not compatible with natural resource conservation, it should be eliminated by BLM.

6-2

3. The RMP/EIS does not adequately deal with the issues of grazing management and range improvements. Although their implementation within the RMP is mentioned in general terms, the RMP/EIS offers no indication of specific range improvements or grazing management regimes to be implemented, either by allotments or within alternatives. We assume that the difference in long term estimated carrying capacity between Alternative C (20,285 AUMs) and Alternative D (18,639 AUMs) is attributable to differential levels of management. However, these differential levels of management are not discernable when grazing management is summarized as an "intensive program of grazing management" for Alternative C and as a "program of improved grazing management" for Alternative D (pp. 2-41 and 2-45, RMP/EIS). Moreover, there is no mention of range improvements which might contribute to clarifying the differences in long term carrying capacity between these two alternatives.

6-3 Furthermore, we are confused as to why estimated carrying capacity under Alternative D would not exceed that of Alternative A in the long term (p. 2-11, RMP/EIS). Under Alternative A, estimated carrying capacity would remain static, as would ecological condition on all categories of allotments (p. 4-3, RMP/EIS), without implementation of additional range improvements or grazing management. Why, then, would long term carrying capacity in Alternative D, which includes a "program of improved grazing management", not exceed that of Alternative A?

If the efficacy of range improvements and grazing management in Alternative D is so minimal as not to affect carrying capacity in the long term (relative to No Action), we recommend that the "intensive program of grazing management" associated with Alternative C be implemented in substitution. The increased carrying capacity realized

6-3 (cont) under this management program will be reflected in improved vegetative and soil conditions, as well as wildlife habitat, in the RPRA.

6-4 4. Nowhere in the draft RMP/EIS could we find mention of rodent control as a possible management stratagem for improving range conditions. There is evidence that suggests prairie dogs, for example, can retard the improvement of range conditions despite reductions in livestock grazing intensity. Current BLM policy on Animal Damage Control (ADC) requires authorization of rodent control projects by the BLM. Specific guidelines have been developed to aid the BLM in making decisions regarding rodent control in New Mexico (Guidelines for authorizing Rodent Control on Public Lands; BLM Instruction Memorandum No. NM-83-36; November 8, 1982). We recommend that rodent control, per those guidelines, be included in potential range management actions described in the final RMP/EIS.

6-5 5. We are concerned that the RMP/EIS for the RPRA does not list the New Mexico Department of Agriculture (NMDA) as a document recipient for public review (p. 5-3, RMP/EIS) nor does it request comments from NMDA. We have commented previously on this omission to BLM and since have been assured of inclusion, as evidenced in the draft RMP/EISs for West Socorro and the White Sands Resource Areas, and the draft MFP/EIS for the Las Cruces/Lordsburg Resource Area.

More importantly, the RMP/EIS makes no mention of the BLM New Mexico Rangeland Consultation, Cooperation, and Coordination Policy (Section 8, Public Rangelands Improvement Act). As a member of the Section 8 Target Group, we feel this information must be included in the current RMP/EIS. In this matter, we recommend a format similar to the one followed by BLM in the publication of the RMP/EIS for the White Sands Resource Area.

6-6 6. Except for a brief reference on page B-4 of the Rio Puerco RMP/EIS, no mention is made in the body of the draft concerning the five-year monitoring program that must be completed by BLM prior to adjustment of allotment stocking rates. Considerable reference is made to phasing in adjustments over a five-year period. We assume the phase-in period will follow, not precede, the initial five-year monitoring program. Additionally, mention of the methodology to be utilized by BLM during the five-year monitoring program is conspicuously absent from the RMP/EIS. If the five-year monitoring program is similar to those promulgated in prior Rio Puerco grazing EISs, BLM should make that clear.

6-7 Finally, we question the accuracy of estimating short term and long term carrying capacities within alternatives in advance of results from the five-year monitoring program and subsequent monitorings. We recommend that BLM refrain from making precise estimates of carrying capacities (p. 2-11, RMP/EIS). Instead, we suggest that BLM substitute a general and subjective estimate of expected directions and magnitudes in carrying capacities. This modification will avoid the deceptive

6-7 (cont) precision of the current, nonsubstantiated predictions while, at the same time, incorporate BLM's evaluation of probable short and long term AUM adjustments.

6-8 7. In Table 4-1, and in the Wildlife sections of each alternative description in Chapter 4, the BLM refers to "conflict levels" between livestock and wildlife. However, no specifics are offered on the species of wildlife that are in conflict nor on the sources of data or literature sources that were relied on to conclude the conflict levels stated. It is doubtful that all wildlife species are impacted to the same degree by livestock grazing and there is evidence that suggests some wildlife species are benefited by livestock grazing (for example, see Holechek, J. L., R. Valdez, S. D. Schemnitz, R. D. Pieper, and C. A. Davis. 1982. Manipulation of Grazing to Improve or Maintain Wildlife Habitat. Wildl. Soc. Bull 10:204-210). We feel the goals of habitat management, by species of wildlife, must be stated and supported with literature or data since "conflicts" with livestock grazing differ among wildlife species.

6-9 8. The RMP/EIS infers that the U.S. Fish and Wildlife Service (USFWS) has exclusive responsibility for ADC activities on public lands in the RPRA. This assumption is incorrect. The RMP/EIS is deficient on this topic insofar as it neglects to mention the roles played by NMDA and the New Mexico Department of Game and Fish (NMDGF) in the development of annual BLM district ADC plans. In addition, certain functions (i.e., cougar, bear, and wild ungulate damage control activities) are not handled by the USFWS but are the responsibility of the NMDGF. We recommend recognition of these state entities in the final RMP for the RPRA.

9. We request clarification on three minor points:

6-10 A. The five-year average use level in the RPRA issue area is listed as 7,990 AUMs (p. 4-3, RMP/EIS), 20 percent below current allowable livestock grazing use. This figure does not correspond to the information included in Table 2-1 (p.2-11, RMP/EIS). Please clarify this discrepancy.

6-11 B. The number of Section 15 allotments in the RPRA issue area is unclear. Seventy-six Section 15 allotments are mentioned on page 3-12 (RMP/EIS), whereas 68 Section 15 allotments are mentioned on page 3-22 (RMP/EIS). What is the correct number of Section 15 allotments in the issue area covered by the RMP/EIS?

6-12 C. We assume that Section 15 allotments will be grazed at historic levels (past five-year average use levels) since intensive management and monitoring programs are not anticipated for these lands. Additionally, we understand that reductions in allowable

6-12 (cont) livestock grazing use will not be implemented on Category M and C allotments, which include Section 15 lands. If these assumptions are true, how will the stocking rate analysis described on page 3-12 (RMP/EIS) be used by BLM?

Summary

Based on the information provided in the Rio Puerco RMP/EIS, and our analysis of it, we support the BLM's preferred alternative with certain modifications. The misuse of the word conservation to differentiate between Alternative B and Alternatives C and D should be corrected. Range improvements and grazing management regimes planned for Alternative C should be applied to Alternative D if at all possible. The ommission of NMDA as a participant in the planning process should be corrected and inclusion of BLM's Section 8 policy, including target group, should be standard policy for future RMP/EISs. Range monitoring policy and monitoring methodology should receive adequate attention. Also, BLM should recognize state agencies, such as NMDA and NMDGF, which are involved in ADC.

We appreciate the opportunity to present our comments, and we hope they will contribute toward the refinement of the Rio Puerco Draft RMP/EIS.

Sincerely,

W P. Stephens

William P. Stephens
Director/Secretary

WPS/kh

Responses to Comment Letter #6.

6-1 All four alternatives meet the sustained yield and multiple use management requirements of the Federal Land Policy and Management Act, and therefore provide management practices which would conserve and perpetuate renewable resources. These proposed management practices do vary in the alternatives by favoring or emphasizing one renewable resource over another. For example, Alternative B favors wildlife over livestock grazing, while Alternative C emphasizes fuelwood harvest at the expense of recreation opportunity. These differences in renewable resource management practices proposed in the alternatives were not intended to contribute to any greater or lesser degree of conservation. They, however, were intended to provide for variation in the harvest of renewable resources allowed for each alternative.

The changes in management practices that make one alternative more or less conservation oriented than another are those proposed for the nonrenewable resources. For example, Alternative B poses the greatest limitation on the area of maximum coal development potential and therefore would conserve more renewable resources, while Alternative C is the least restrictive on the area of maximum coal development potential and therefore would have the greatest impact on renewable resources. The alternatives therefore provide a continuum of management practices and conservation measures, with Alternative B at one end of the spectrum providing the greatest conservation of renewable resources, and Alternative C at the other end placing the fewest restrictions on the development of nonrenewable resources, and therefore the least conservation of renewable resources.

6-2 Developing grazing management strategies and locating needed range improvements is appropriate to activity level planning. See the detailed response to comments concerning the lack of specificity in this RMP, at the beginning of this section. The Draft RMP/EIS does explain in Chapter 2 (pages 2-10 through 2-12) that activity plans, known as Allotment Management Plans (AMP's), will be developed for all allotments in the "I" selective management category. AMP's for these allotments will be developed to implement the approved Resource Management Plan. However, since each of the alternatives represents a unique plan that could be accepted as the approved Resource Management Plan, a different level or intensity of grazing management would have to be implemented to accomplish the objectives of each alternative. For example, under Alternative C, management of grazing use would be favored over management for wildlife habitat and watershed protection. Alternative D, on the other hand, would provide management for grazing, wildlife habitat, and watershed protection. Therefore, your assumption is correct that the differences in long-term estimated AUM's for Alternatives C and D are attributable to differential levels of management.

6-3 The assumption has been made that the public lands in the vegetative uses issue area can not produce the (grazing preference) currently allowable AUM's for grazing under Alternative A on a sustained yield basis. This assumption is based on available vegetative data and authorized grazing use over the last five years. With the management changes that would be implemented under Alternative D, these public lands could provide the AUM's currently allowed under Alternative A on a sustained yield basis, and provide for wildlife habitat needs, and improved watershed condition. Under Alternative A, the public lands will not provide additional AUM's for these purposes in either the short or long term.

6-4 Rodent damage has not been identified as a cause for the range conditions reported in this Plan. Rodent control, when needed (e.g., if identified in an activity plan), can be authorized by existing policies described in the "Continuing Management Guidance" section in Chapter 2 of this Plan.

6-5 Your agency did receive a document; however, we apologize for the inadvertent exclusion of your Department from the list of document recipients in Chapter 5 of the Draft RMP/EIS. This oversight has been corrected in the Proposed RMP/Final EIS.

In Chapter 5, page 5-2 of the Draft RMP/EIS, it is stated that we will comply with Section 8 of the Public Rangelands Improvement Act of 1978. Although not referenced in this chapter, New Mexico BLM State Office Instruction Memorandum No. NM-83-260 establishes the policy and procedures that will direct our compliance with the consultation, coordination, and cooperation requirements of this public law. This instruction memorandum is included in the Management Situation Analysis companion document available at the RPRA Office. See the detailed response to comments concerning the lack of specificity in this RMP, at the beginning of this section, for an explanation of the relationship of the Resource Management Plan and the Management Situation Analysis.

6-6 If the affected allottee agrees, adjustments in livestock grazing use can be phased in prior to the completion of the vegetative monitoring studies (which will not exceed five years). The phase-in period can also begin prior to completion of monitoring studies if there are acceptable vegetative data available on which to base the adjustments. 43 CFR 4110.3-3 discusses in detail the implementation of changes in available forage.

A vegetative monitoring plan has been developed to guide all vegetative studies for the RPRA. This monitoring plan is part of the Management Situation Analysis companion document of the RMP, available for review at our office. The detailed response to comments concerning the lack of specificity in this RMP at the beginning of this section further describes the relationship between the RMP and the MSA.

6-7 The estimated short- and long-term AUM's displayed in the Draft RMP/EIS are not intended to be predictions. These estimates are intended to indicate trends within alternatives to permit comparisons between alternatives.

6-8 The conflict levels were determined by ecological condition classes for each allotment. In the analysis of grazing impacts on wildlife we reviewed literature listed in a publication by the Department of Fisheries and Wildlife Sciences at New Mexico State University in cooperation with the U.S. Fish and Wildlife Service entitled "Livestock-Wildlife Interactions on Public Land in New Mexico, a Bibliographic Study." We also looked at "Livestock-Wildlife Interactions in the Southwest (Arizona and New Mexico)" by Nancy Nowakowski and Peter Ffolliott which was prepared for the U.S. Forest Service in 1980. The consensus of the literature, including the article by Holechek and others, is that heavy grazing is detrimental to most wildlife species.

6-9 The ADC program in New Mexico is a cooperative program between the U.S. Fish and Wildlife Service and the New Mexico Department of Agriculture. The annual Animal Damage Control Plan for public land in the Albuquerque District involves BLM, USF&WS, NMDA, and the New Mexico Department of Game and Fish. The New Mexico Department of Game and Fish has responsibility for damage by game species.

6-10 The five year average use level of 7,990 AUM's (p. 4-3, Draft RMP/EIS), 20 percent below current allowable livestock grazing use, is for the Section 3 permitted lands. Table 2-1 (page 2-11 of the Draft) refers to the Section 3 permitted and Section 15 leased lands. A correction has been made in the Proposed RMP/Final EIS to indicate that the 7,990 AUM's is the five year average use level for the Section 3 permitted lands.

6-11 Seventy-six Section 15 allotments are located within the vegetative uses issue area. This correction has been made in the Proposed RMP/Final EIS.

6-12 All Section 15 leased allotments are in the "Custodial" selective management category. The stocking rate analysis was conducted for these allotments only to assist in selective management category determinations.

7

STATE OF NEW MEXICO

OFFICE OF CULTURAL AFFAIRS
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TONEY ANAYA
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THOMAS W. MERLAN
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CULTURAL AFFAIRS OFFICER

June 27, 1985

Mr. Herrick Hanks
Area Manager
Rio Puerco Resource Area
Bureau of Land Management
Post Office Box 6770
Albuquerque, New Mexico 87107

Re: Draft Rio Puerco Resource Management Plan and Enviromental Impact Statement

Dear Mr Hanks:

Thank you for the opportunity to comment on the above document. Our comments pertain only to the cultural resources sections of the proposed Plan and DEIS.

7-1 Overall, the document presents an extremely brief description and assessment of cultural resources that may be affected by implementation of any of the proposed alternatives. This is disappointing in view of the fact that the document is intended to outline a management plan that establishes multiple resource management directives for the next five to twenty year period.

7-2 As a whole, the document appears to be based on minimal analysis of existing cultural resource information. Despite the checkerboard nature of much of the area encompassed by the resource area, the assessment of the affected environment for cultural resources does not appear to draw from cultural resource inventories completed on lands adjacent to those administered by the Rio Puerco Resource Area. Cultural resources in such areas may well be affected by Bureau-authorized actions (for example, access into previously inaccessible areas by Bureau-authorized roads or ORV traffic) and should be considered in any assessment of effect. It is possible that more extensive analysis of cultural resource information was completed by the Bureau as part of Plan and DEIS development; if so, however, it is not evident in the document. We recommend strengthening the final Plan/DEIS by including a more extensive analysis of cultural resources which may be affected by development in the various proposed activity areas and alternatives.

According to the document (page 3-19), only 5.5% of the resource area itself has been inventoried at present, resulting in the recordation of almost 4,000 sites. In general, it would have been preferrable if additional inventories could have been completed as part of the data gathering component of Plan preparation. Assuming a comparable site density in the remaining 95% of the resource area, there could be 80,000 additional sites which are as-yet unrecorded and which would also be subject to potential adverse effects from implementation of the Plan.

7-3 The Plan does indicate that locations subject to surface-disturbing activities will generally receive prior archaeological inventory. However, since many of the projected land uses are characterized by dispersed activities which may adversely affect cultural resources, we recommend that the proposed Plan be modified to provide for a systematic program of non-project-specific inventory throughout the period of Plan implementation to insure that activities such as recreation, ORV traffic, and grazing are not adversely affecting cultural resources. It is also recommended that the Plan provide for systematic inspection of known significant sites to insure that they are not deteriorating from natural or man-caused factors.

7-4 The Plan also appears to contain no systematic mechanism for nominating eligible properties to the National Register of Historic Places. The document (page 2-20) indicates that the Bureau prepares and submits nominations of "priority cultural resource properties" to the National Register of Historic Places. However, the fact that only three sites are listed on the National Register of Historic Places (page 3-19) suggests that this has not been a high priority in the past, in spite of the fact that such a program is required by Section 110 of the amended National Historic Preservation Act. We recommend that the Plan be modified to provide more definite plans for completing such Section 110 inventory and nominations. This would be particularly appropriate for significant sites located in the proposed Special Management Areas.

Pages 2-20 to 21 of the document provide a brief overview of existing cultural resource management practices which will presumably be carried over into the period of Plan implementation. For example, the document indicates that Section 106 consultation with this office and the Advisory Council on Historic Preservation will be completed for Bureau-authorized projects, as appropriate. Other portions of the document indicate how cultural resources will be treated during various types of activities such as coal mining and oil and gas development. The document also includes copies of standard stipulations which govern cultural resource management for particular types of activities.

7-5 These portions of the document provide a useful indication of some of the management measures which are available to protect cultural resources during resource development projects. However, the Plan/DEIS would provide a more informative account if some indication of the intensity of existing and anticipated cultural resources management practices were also included in the document. For example, what do "application of both administrative and physical measures on a limited basis" or "patrol and surveillance effort, conducted on an irregular basis" (page 2-21) mean in terms of activities actually performed?

Mr. Herrick Hanks
June 27, 1985
Page Two

The lack of specificity and detail regarding cultural resources throughout the document as a whole limits the degree of independent analysis of alternatives that can be completed. Overall, however, Alternatives B and D would appear to be the preferred alternatives for cultural resources, primarily because of the 22 proposed special management areas. The special management designations would appear to provide a good mechanism for affording special management attention to selected known resources, particularly as individual management plans for each of the areas are completed.

7-6 We are pleased to see that the Bureau proposes to focus special management attention on such selected areas. However, it would again be useful if more specific information were provided regarding the benefits that SMA designation will afford to cultural resources. For example, will patrols be increased in areas where vandalism is noted or where potentially vulnerable resources are known to be present? When will inventories be completed in these areas? Will any steps be taken for stabilization of sites which are deteriorating? This type of specific information is generally lacking from the document, even for the recommended SMAs.

In summary, we suggest that the description of the affected environment and alternatives be modified to include a more detailed analysis of cultural resources which may be affected by adoption of the various alternatives. We also recommend that the Plan be modified to provide for systematic Section 110 inventories, site inspections and National Register nominations to be completed as part of Plan implementation.

If we can provide additional information, please let us know.

Sincerely,

Thomas W. Merlan
State Historic Preservation Officer

TWM:NW:bc

Responses to Comment Letter #7.

7-1 See the detailed comment on lack of specificity at the beginning of this section.

7-2 This document is based on an analysis of existing cultural resource information, including all available cultural resource information from non-Bureau lands adjacent to or close to Bureau-managed lands. Cultural resources on both Bureau- and non-Bureau managed lands will undoubtedly be affected by Bureau-authorized actions in the future, as they have been in the past. Consideration of direct and indirect impacts is a major cultural resource program concern, and will remain so (see the "Compliance" section on page 2-21 of the Draft). While much more information was compiled in the MSA while preparing the Draft (see the response at the beginning of this section concerning lack of specificity), the MSA does not contain the level of information or analysis recommended in this comment. What the RMP does is establish direction and goals, thereby creating a formal framework for the necessary inventory and evaluation that must precede a Cultural Resource Management Plan (cultural resource activity plan). It is inappropriate for a Resource Area-wide land use plan to attempt program- and site-specific provisions, just as it would be inappropriate to include a more extensive analysis of currently known cultural resources that "may be affected" by various "proposed" alternatives. Management decisions were made in which existing levels of data were determined sufficient; once that management decision and the timetable for the RMP were determined, no additional inventory was possible.

7-3 It is extremely unlikely that funding will be available for non-project-specific inventory in the near future. As explained in the "Continuing Management Guidance" section (pages 2-20 and 2-21 in the Draft), monitoring, inventories prior to surface disturbing activities, and compliance follow-up through report review and on-site inspections will continue. Such standard provisions are part of our continuing cultural resources management program, along with permitting, site record management, patrol and surveillance, nominations, budget input, and other levels of planning and coordination. See also the response to comments concerning lack of specificity at the beginning of this section for more detail about continuing management guidance.

7-4 The RMP calls for the development of activity plans (e.g., Cultural Resource Management Plans) where applicable for each SMA. Inventory and evaluation for activity planning will include formal determinations of eligibility and will eventually result in nominations to the National Register.

7-5 Intensity of management practices varies with budget, staffing, priorities, and many other considerations. It is impossible to provide a twenty year land use plan, given current data gaps, that can provide the kinds of specific information requested.

7-6 The specifics asked for will be available as Cultural Resource Management Plans (CRMP's) are completed for the SMA's. Additional information may become available through protection plans or other specific function plans that may be generated independently of specific CRMP's. The approved Resource Management Plan, which will be published after this Proposed RMP/Final EIS is completed and any protests are resolved, will identify priorities for implementation. Assessment of stabilization needs is part of our continuing management guidance and is generally conducted on an annual basis. See also the response at the beginning of this section concerning the lack of specificity in the RMP.

8

HEALTH ENVIRONMENT department

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TONEY ANAYA
GOVERNOR

DENISE D. FORT
DIRECTOR

June 28, 1985

Ms. Susan Tixier
Office of Policy Analysis
Department of Finance and Administration
Rm. 403B
Capitol Building
Santa Fe, New Mexico 87502

Re: Rio Puerco Resource Management Plan - Draft 156ER

Dear Ms. Tixier:

EID staff have reviewed the above-mentioned document for air and water quality impacts and have the following comments to submit.

There appear to be no significant air quality concerns related to any of the management alternatives presented. Allowable minerals activity and road construction under all alternatives may ultimately require consultation with EID's Air Quality Bureau and/or compliance with state and federal air quality regulations on a case-by-case basis.

A detailed assessment of groundwater impacts in the Rio Puerco Management Area also cannot be made at this level of land use planning. As with air quality, any groundwater impacts associated with allowable activities under any alternative will be addressed later on a more detailed basis.

8-1 The RMP does not provide sufficiently detailed information on soil and water management practices to do an in-depth analysis of surface water quality impacts. The Rio Puerco Management Area has one of the most serious erosion and sedimentation problems for its size in the country. The Resource Conservation Alternative (B) addresses these concerns most thoroughly and immediately of all the alternatives presented, but may still may not contain sufficient measures to adequately address erosion and resultant water quality concerns.

8-2 For example, we question the seemingly high allowable levels of ORV use under this and all alternatives. Not enough information is included in the document to assess whether or not water quality will be protected under the permitted levels of use. We recommend a more in-depth examination of the extent to which ORV's are currently present in the Rio Puerco Management Area, and the degree to which this use contributes to the area's erosion problems. For all alternatives, we are concerned about the BLM's ability to adequately monitor and enforce restrictions on ORV use throughout the RPMA, given limited agency resources now and in the

8-2 (cont) future.

8-3 We are also concerned about the negative socio-economic impacts of severely reduced grazing on local ranchers. We recommend a more in-depth analysis be conducted to measure the short-term negative impacts on grazing interests against the longer-term economic and environmental impacts of severe degradation of the soil and water quality of the area. If the environmental damage is as severe as it appears, then perhaps state government should move in other ways to address the economic dislocation caused by reduced grazing.

Thank you very much for the opportunity to comment on this document.

Sincerely yours,

Denise D. Fort
Director

Responses to Comment Letter #8.

8-1 The RMP is not intended to provide detailed soil and water data (see the detailed response on lack of specificity at the beginning of this section). This level of information is developed for activity plans. A detailed listing of soil and water management practices can be found in the Management Situation Analysis companion document available in the RPRA Office. In addition, the BLM utilizes practices developed by others, such as the USDA Soil Conservation Service and Forest Service, universities, and State agencies. Much of this information is available for review in the Management Situation Analysis companion document to this RMP.

8-2 Frequency and intensity of monitoring and enforcement will continue to be dependent on funding. As budgets increase or decrease, our ability to fund these activities will change. In addition, we could seek to enter into cooperative agreements with local and State agencies, and use volunteers or work-study students for monitoring and enforcement. Cooperatively developing education programs with local ORV user groups, installing signs to inform the public of ORV restrictions, and providing information concerning the off-road vehicle trail system could provide inexpensive methods of enforcement. In addition, monitoring and enforcement will become a part of each affected resource program's day-to-day responsibilities. See also the ORV "Implementation" section in Chapter 2.

8-3 We do not have data with which to put an economic value on the degradation of soil and water quality. Therefore, we are not able to make the analysis you have requested; however, in the professional judgement of our specialist, short-term impacts to livestock operators will have some social effects and minimal economic effects. If the soil degradation continues, livestock grazing will eventually be reduced in the long term as a smaller quantity of productive soil is available. There would be costs related to water storage, fisheries and water, forest habitat, agriculture, and perhaps other water uses.

9

State of New Mexico

DEPARTMENT OF GAME AND FISH

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RECEIVED JUN 2 4 1985

June 19, 1985

Mr. Herrick E. Hanks, Area Manager
U.S. Bureau of Land Management
Rio Puerco Resource Area
3550 Pan American Freeway, NE
P.O. Box 6770
Albuquerque, New Mexico 87197-6770

Dear Mr. Hanks:

9-1 I have reviewed the Draft Rio Puerco Resource Management Plan and Environmental Impact Statement (RMP/EIS). In many respects the plan is well prepared, but those portions pertaining to wildlife do not provide sufficient detail to conduct a thorough review of your planned actions. The wildlife information presented in the plan is simply too general. Except for those wilderness study areas where wildlife is specifically mentioned, the plan fails to adequately address how the various activities will impact wildlife.

9-2 Another problem with the plan is the allotment of animal unit months (AUM's). AUM's in many respects are symbolic figures that may or may not reflect actual use. These values do, however, give an indication of the priorities an agency such as yours places on wildlife and its habitat. In the present situation, I feel that a minimum of 45% of the AUM's be placed in the no use class to allow for vegetative recovery. An additional 20% should be allotted to wildlife, with the remaining 35% going to livestock. If your studies indicate that range is still being overgrazed after apportioning the AUM's in this manner, then livestock allocations should be reduced.

9-3 I am concerned with the apparent lack of concern for riparian habitats. The statement on page 3-12 that "... riparian habitats in the RPRA are not significant wildlife habitat

9-3 (cont) because of the lack of vegetative diversity and distance from major migration corridors" is unfounded. Riparian habitats are extremely important, not only to migrant species, but also to numerous resident species of wildlife. Vegetative diversity in many areas within the Resource Area may not be inherently low, but rather the result of past land use practices. To simply "write off" such areas seems a bit premature and fails to acknowledge the importance of such areas to all species of wildlife.

The section on Off Road Vehicles (ORV) is good because it restricts ORV use. 9-4 I am afraid, however, that many areas will not, because of insufficient funding and limited personnel, receive the protection being promised. This is especially important in many of the 22 Special Management Areas, which have ORV restrictions to protect wildlife habitat, archaeological sites, or other attributes of these areas. What assurances does my agency and the public have that the BLM will be able to enforce its ORV policy?

Sincerely,

Harold F. Olson
Harold F. Olson
Director

whb

cc. Daniel Lopez (Secretary, Dept. Finance & Administration)
Leo Griego (Secretary, Natural Resources)
✓Susan Tixier (Office of Policy Analysis)
Dan Pursley (NW Area Supervisor)

Responses to Comment Letter #9.

9-1 See the detailed response at the beginning of this section concerning the lack of specificity in this RMP.

9-2 It is speculative to assume that your recommended forage allocations would be appropriate to all grazing allotments. Each grazing allotment has a different history of use, vegetative potential and conditions, wildlife potential, and resource conflicts. Therefore, a different set of forage allocations and management prescriptions would be needed for each allotment to ensure sustained vegetative vigor and reproduction, and to provide the forage needs for wildlife habitat and livestock grazing use. Determinations of the types of management changes needed and adjustments in forage allocations will therefore be made for individual allotments, and will be based on the current vegetative inventory and five years of vegetative monitoring studies.

9-3 Riparian areas within the RPRA are associated with headcut arroyos, stock reservoirs, small springs, and such drainages as the Rio Puerco, Arroyo Chico, and Rio Salado. These systems do not support the vegetation of more noteworthy riparian areas because of the low productivity of the soil type, flooding, and their ephemeral nature. Livestock grazing is only partially to blame for their present condition. Although these areas may be significant to local fauna, they are not significant on an overall basis. Diversity indices calculated by Odum's method for Emlen transect data collected between 1978 and 1981 rank the riparian zone in Rio Salado fifth in the winter and fourth in the summer for habitats sampled in Rio Puerco monitoring studies.

Since existing policies and management plans cover the protection and management of these areas, BLM will not be "writing off" these areas. See Continuing Management Guidance, Chapter 2.

9-4 See the response to Comment 8-2.

10

STATE OF NEW MEXICO
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TONEY ANAYA
GOVERNOR

LEO GRIEGO
SECRETARY

June 18, 1985

Mr. Herrick E. Hanks, Area Manager
Bureau of Land Management
Rio Puerco Resource Area
3550 Pan American Freeway NE
P O Box 6770
Albuquerque, NM 87197-6770

Dear Mr. Hanks;

Thank you for the opportunity to comment on the Draft Rio Puerco Resource Management Plan and Environmental Impact Statement (RMP/EIS). After reviewing the document the Natural Resources Department staff offer the following comments, concerns and recommendations.

The RMP/EIS is well written. The background information and necessary definitions are in the document. There are summaries of the grazing EIS's, decision records and other documents making up the Rio Puerco Resource Area management plans in the RMP/EIS making the cross-referencing of all the required documents an easy task.

The seven key management issues: Special Management Areas, Off-Road Vehicle Designation, Vegetative Uses, Land Ownership Adjustments, Fuelwood Supply, Rights-of-Way Corridors, and Coal Leasing identified in the document were well chosen. They encompass the major concerns and conflicting multiple uses of the resource area. Listing the planning criteria associated with each of the key management issues was beneficial in the RMP/EIS review.

We were pleased to see the use of the three support programs: Fire Management, Access, Transportation and Right-of-Way(ATROW); and Cadastral Survey mentioned in the RMP/EIS. We support the "Joint Powers Agreement" in fire management and suppression. We commend your use of a prescribed burning program to help improve habitat.

The RMP/EIS covers recreational uses extremely well. A variety of opportunities are provided for recreational users. We were pleased to see a whole-hearted commitment to responsible management of the Continental Divide National Scenic Trail when it is established.

You have identified 53 parcels of public lands for potential or further study for potential disposal(pg 2-38). The Rio Puerco Resource Area has an active land exchange program. The New Mexico Bureau of Land Management signed a Memorandum of Understanding with the State Land Commissioner on October 3,1984 to establish a land exchange program. We recommend that the lands identified for disposal be exchanged wherever possible.

The discussion of all the proposed management alternatives in chapters 2, 3, and 4 is superficial. While it is beneficial to make note of the possible long-term and short-term impacts on the various issues, it would be helpful to know the actual reasons for these impacts, the direction of the land management plan and some of actual proposals for future activities. 10-1 The RMP/EIS lacks the depth and supporting data necessary to make comprehensive, objective and detailed comments required for a responsible land management planning process.

Twenty-two Special Management Areas (SMA's) have been identified and described in Appendix C. Each alternative lists the number of the SMA's which would be designated and managed for its unique resource. 10-2 There is no discussion of how the areas are to be managed other than occasional mentions of management designations such as area of critical environmental concern (ACEC) or outstanding natural area (ONA). While we support the designation of all 22 areas, we would like to see at least an outline of how the SMA's will be managed if they are designated.

10-3 An example of the lack of specificity concerning management goals for the areas is the Jones Canyon SMA recommendation as an ACEC for reasons which include protection of riparian habitat. More detail is needed to analyze whether proper management will be implemented to meet the criteria under which the SMA's will be designated. There is no discussion or recommendation concerning cattle grazing within this area, yet cattle use will have definite impacts on the quality of riparian habitat which is to be protected.

10-4 Several of the SMA's are areas being considered for wilderness designation under a separate DEIS. There is no mention of a management plan for all the areas which were dropped from wilderness study by former Secretary Watt and were under litigation. A court ruling has placed these areas back into wilderness study. Areas such as La Lena, Chamisa and Empedrado wilderness study areas (WSA's) are not mentioned in the RMP/EIS. There is no mention of how the largest natural arch in New Mexico located in Rimrock WSA will be managed and protected if Rimrock is not designated as a wilderness area.

We support the closure of ORV usage in the proposed Bluewater ACEC to augment protection of the riparian habitat. We recognize thatriparian habitat is a very limited yet critical habitat type in the resource area. 10-5 However, ORV closure alone will not totally protect this area as long as cattle grazing continues to concentrate cattle in this habitat. We would like to see more detailed management proposals for this area and the other SMA's.

The issue of ORV use in the resource area is critical. We support the elimination of totally "open" motorized vehicle usage. BLM proposes to limit ORV use to designated roads and trails throughout most of the area and provide special event areas to accomodate intensive use. The recreation plans for ORV use should meet the needs of the general public and provide responsible multiple use management.

10-6 We would like to know how BLM expects to enforce the limited ORV use designations in the field. This seems to be a practical impossibility given the size and remoteness of the area when compared to BLM staff and financial resources. Given the free wheeling sentiment of the ORV user community to resist regulation, we feel that monitoring and enforcement of the proposed ORV limited usage must be an essential on-the-ground reality in the SMA's.

Many of the SMA's are being recommended for wildlife, archaeological, rare plants, or other sensitive environmental values. All of these values will be negatively impacted by illegal or indiscriminate ORV use. The closures outlined (pg 2-41) partially address this point but a majority of the SMA's are left as "limited to existing roads and trails". We would like assurance that the SMA's will be protected from illegal or indiscriminate ORV use.

Indiscriminate ORV use can easily promote soil erosion by destroying the covering vegetation. 10-7 On the whole the RMP/EIS is very general in its treatment of soil and water uses and management policies. We would like to see responsible guidelines in the plan which would aid in the reduction of wind and water erosion and help preserve our soil and water resources.

The West Socorro Rangeland Management Program EIS, one of the documents being addressed as part of the overall resource area management plan, recommends pinyon/juniper (PJ) control as a vegetative land treatment in an area located along the continental divide (R13W, T6-8N). The methods recommended in the document for controlling the PJ could be either mechanical by pushing rubber-tired or tracked vehicles over the PJ, or chemical by using one of two herbicides, Tebuthiuron and Picloram. 10-8 Since pinyon is

10-8 (cont) the climax species in that location we would like to know why the area is not being managed for its forest potential or at least for a firewood potential.

10-9 The West Socorro Rangeland Management Program EIS advocates the use of herbicide spraying as one of the vegetative land treatments. The EIS does not address in sufficient detail the application process, the controls to be used or the monitoring process for the herbicide spraying. In keeping with Executive Order No. 84-20 which states "Whereas, it is desirable to reduce the use and reliance on chemical pesticides to control crop, range and forest pests because of the potential adverse impacts on the environment..." we cannot support any herbicide spraying project unless we are assured that all necessary controls, monitoring devices and plans are in place before the start of the project to reduce any potential adverse impact on the environment.

The RMP/EIS addresses 92 grazing allotments (123,300 acres of public lands) which were not considered in the other grazing EIS's. "A range inventory has been conducted for the purpose of designating ecological condition for each range site, determining the selective management category, and identifying existing range improvements." (pg 1-5) On the Summary of Allotment Condition and Authorized Use Table (Appendix S) 75 of the 92 allotments list "unknown" as the ecological condition and apparent trend as the data for those allotments and 79 allotments have been classified as C management category. 10-10 The document is ambiguous in its use of range site, allotment, and whether or not the category C allotments are Taylor Grazing Act, Section 15 lands. We would like to see a sufficient, existing data base used in making range management decisions.

10-11 Plant species of concern are addressed in the discussions of the individual SMA's. It is not clear how surface disturbances will be avoided or how motorized traffic will be limited to existing roads and trails to protect these taxa. The maps for the rights-of-way corridors and the text describing them do not agree on the proposed locations. We would like assurance that any rare plant habitat along these proposed routes will be protected.

10-12 After careful review of your proposal we find that recent discoveries and additions to our system have added several species of rare plants with potential for occurence in the Rio Puerco Resource area.

10-12 (cont)

FEDERALLY LISTED SPECIES
- Erigeron rhizomatus

FEDERAL CANDIDATE SPECIES (CATEGORY 1 AND 2)
- Proboscidea sabulosa

FEDERAL CANDIDATE SPECIES (CATEGORY 3)
- Astragalus accumbens
- Astragalus siliceus
- Petalostemum scariosum

STATE SENSITIVE SPECIES

- Astragalus cyaneus
- Astragalus micromerius
- Aletes sessiliflorus
- Mentzelia perennis

We would like assurance that a current rare plant inventory will be used in the management plans for the resource area.

Habitat for some of the plant species included in the above list occur outside identified SMA's. There are no specific plans for impacts of these rare plants located outside the SMA's. We would to have a current and complete rare plant data base in the RMP/EIS before we make our management recommendations for the entire resource area.

10-13 The document states that "it is not feasible to implement grazing management on tracts in Torrance County, any impacts grazing has on McCown's Longspur are not addressed" (pg 4-40). Even though the BLM tracts in Torrance County are small, widely scattered, identified for potential disposal, and not currently leased for grazing, an analysis and documentation of management effects on this species is germane to this document. We feel the lack of specific wildlife data, analysis, and recommendations throughout the document is a serious deletion within the plan.

There is also a need for more detailed wildlife management proposals in the SMA's. The San Luis Mesa Raptor Area (pg 2-27) has been recommended to protect nesting habitat. Within this area, ORV use will be limited to existing roads and trails, yet there is no recommendation for buffer areas around nesting sites. This seems contrary to the purpose of creating this particular SMA.

10-14 The information provided in the plan on wildlife species is very broad and lacks any specificity. The RPM/EIS states that BLM maintains a current inventory of wildlife habitat and species occurrence, and that this information is used in the planning and

10-15 (cont) decision making process (pg 2-12). Yet, there are no specific guidelines for the reviewer as to how BLM uses this data in decision making. It is not possible to evaluate the effect of this RMP on wildlife in the resource area except in those specific SMA's where wildlife are discussed.

10-16 We would like to have some actual proposals of land uses, not just unsupported, projected short-term and long-term impacts, before recommending one alternative as a best land management plan. The support data in many cases is insufficient for making recommendations for a responsible management plan. We cannot support any of the alternatives listed in the RMP/EIS until we have more detailed management proposals to review.

Sincerely,

Leo Griego

LEO GRIEGO
Secretary

jb

Responses to Comment Letter #10.

10-1 See the detailed response on lack of specificity at the beginning of this section.

10-2 The "Management Objectives" section for each SMA in Appendix C contains this information. See also the detailed response on lack of specificity at the beginning of this section.

10-3 The riparian portion of Jones Canyon is on private land. Our objective is to develop an activity plan which will address management and acquisition of the riparian habitat. See also the response on lack of specificity at the beginning of this section.

10-4 Table 2-2 has been revised to include the split-estate areas which were reinstated as Wilderness Study Areas. See also the response to Comment 27-14.

The detailed activity plan for El Malpais SMA will cover the natural arch in the Rimrock WSA. See the detailed response concerning the lack of specificity in this RMP, at the beginning of this section.

10-5 A management plan currently exists which imposes a closure to grazing, mineral leasing, and woodcutting.

10-6 See the response to Comment 8-2.

10-7 See the response to Comment 8-1.

10-8 Not all pinyon-juniper stands are suitable for fuelwood harvest. Those that are will be harvested; those that are not may be treated with herbicide.

10-9 Any herbicide treatment, whether proposed by a grazing EIS, land use plan, or activity plan, would have a site-specific environmental analysis prepared to assess the environmental impacts and to establish necessary controls and monitoring prior to application.

10-10 "Allotment means an area of land designated and managed for grazing of livestock" (43 CFR 4100.0-5). Therefore, Section 3 permitted and Section 15 leased lands are referred to as allotments in the Draft RMP/EIS. All Section 15 leased allotments and four Section 3 permitted allotments were placed in the "C" selective management category.

The Soil Conservation Service (SCS) National Range Handbook defines a range site as a "distinctive kind of rangeland that differs from other kinds of rangeland in its ability to produce a characteristic natural plant community." This handbook further elaborates on what range sites are and how they are used.

Order 3 soil surveys have been conducted by the SCS in the vegetative uses issue area. The SCS correlated soil mapping units delineated in these soil surveys to range sites. These range sites were used as the vegetative sampling units for the inventory of the Section 3 permitted allotments. The SCS guides for the range sites were used to provide the recommended stocking rates used in the stocking rate analysis for the Section 15 leased allotments. Additional information on the inventory and analyses can be found in the Management Situation Analysis (MSA) companion document to the RMP/EIS. The response to comments about lack of specificity at the beginning of this section provides additional information on the relationship of the MSA to the RMP/EIS.

The decisions which will be developed for those allotments on which management changes are needed will be based on existing information and additional data collected during five years of vegetative monitoring studies. The additional data collected from these monitoring studies will provide for the formulation of management decisions which are best suited to the unique environmental situation that exists for each allotment.

10-11 The environmental assessment required prior to authorization of any action in the Resource Area includes a clearance for rare plants. This change has been made in the Continuing Management Guidance. See the response to Comment 8-2 for a discussion of monitoring and enforcement of motorized vehicle restrictions.

We are unable to locate such a discrepancy between the rights-of-way corridor map and the text.

10-12 The BLM cooperates with the Heritage Program in maintaining and updating the rare plant data base. The data base is considered during the environmental analysis process for all actions that occur on public lands in this Resource Area. We plan to continue this cooperation. The data base has been updated to reflect these additions. See also the response to Comment 10-11.

10-13 BLM has no evidence that this species is present on public land. If the species is documented in this area, we will consider management effects at that time. See also the detailed response at the beginning of this section to comments about lack of specificity.

10-14 The activity plan for the SMA will consider nest-specific buffer zones, and will consider seasonal restrictions for surface disturbing activities.

10-15 See the detailed response on lack of specificity at the beginning of this section. There will be no changes in wildlife management, except as discussed for SMA's. A more detailed discussion of current management for the wildlife program may be found in the MSA on file at the RPRA.

10-16 See the detailed response on specifity at the beginning of this section.

11

TÓ HAJIILEEHÉ
CANONCITO BAND OF NAVAJOS

March 29, 1985:

MEMORANDUM

Mr. Herrick E. Hanks, Manager
Rio Puerco Resource Area
United States Department of Interior
Bureau of Land Management
3550 Pan American Freeway, N.E.
P.O. Box 6770
Albuquerque, New Mexico 87107

Dear Mr. Hanks,

Following our meeting in Canoncito on March 26, 1985 we have reviewed the BLM Resource Management Plan and find that Canoncito area would have certain impact. Canoncito as you know is located in (3) Counties of Cibola, Bernalillo and Sandavol covering over 76,000 acres. BLM, States and Tribal Land are adjacent to the Canoncito area from all direction this also includes Private Land. With the many proposed development by all sectors Canoncito Reservation will be severely hampered environmentally, as well as economically.

11-1 The proposed use of BLM Lands in the north area of Canoncito for Competitive Dune Buggy Event we see would not benefit the Canoncito people, but would pose danger to grazing of livestock and other wildlife habitants. This would also severely endanger the many grave sites as well as historical location. In 1984 Canoncito Band of Navajos requested a Federal Acknowledgement Studies to determine the Canoncito Reservation status as well governmental status. The studies of the Office of Federal Acknowledgement Office has determine from the many sources that Canoncito people inhabited those location. The studies clearly states the following:

> The specific area inhabited by the early ancestors of the Canoncito Band of Navajos is what is currently known as the Mt. Taylor Region, or Mt. Taylor massif, approximately fifty miles northwest of modern Albuquerque. Known earlier as either the San Mateo Mountains or the Cebolleta Mountains, the massif area, with its fringing mesas, contain two main land forms rising to over 11,000 and 9,000 feet respectively, the one an extinct volcano and the other a volcanic plateau. All of the various vegetative ecological zones of New Mexico are to be found within the massif and its flanks. During the time when the Navajos occupied the entire massif prior to the encroachment of the Spanish, the Mexicans, and the Americans, it was a rich subsistence area for people of Navajo Culture. It contained most of the usual flora and fauna used by the Navajos, as well as a number of fine alluvial valleys watered by natural drainage from the higher elevations, making the area exceptionally suitable for horticulture in

P.O. BOX 498, CANONCITO, NEW MEXICO 87026 PHONE 836-4221

the Navajo style. "It was, " as Ronald Krutz wrote, "a self-contained geographical province for a Navajo Group" (Kurtz 1963: 106).

As you can see Canoncito has historically live in those location and have aboriginally owned that area of land. We do have available the Federal Acknowledgement should you need a copy, this would give you some indication as to our concern over any development that would endanger historical locations and the wide grazing area.

11-2 We are currently making efforts to recover those area through legislation with the support of our congressional representatives. Your technical assistance is most needed to support our request. In addition should you need any addition documents, we do have available historical records, tapes of elderlys testifying over those geograpical location as historical location, many traces of hogan and other artifacts can still be seen physically.

11-3 We are requesting that any such planning as you proposed be held back until some decision are reach or other alternative plans of use. We are in urgent need of grazing for livestock, the Government has informed us that Canoncito Land is severely overgrazed and that we have implemented reduction in livestock, this however still would limited our livelihood.

We are also requesting that series of meetings be implemented with your office and our congressional representative to determine the most feasible route to take in hopes of recovering those area of land, this would also include some state land as well.

Your kindest understanding most appreciated and request for your serious consideration of our endeavor.

Sincerely yours,

Tony Secatero, President
Canoncito Band of Navajos

cc: File
Sen. Jeff Bingaman
Sen. Pete Dominici
Cong. Manual Lujan, Jr.
Cong. Bill Richardson
Supt. Ed Plummer
Canoncito Field Office

Responses to Comment Letter # 11.

11-1 The proposed Competitive Dune Buggy Event Area will not be used as a "play area." It will be used for organized competitive events four times annually. Dune buggy competition is timed. It is not a cross-country type of race, but requires the use of existing roads and trails with designated passing zones. All events would be monitored by BLM personnel and would adhere to environmental stipulations designed during site planning. The size of the dune buggy competitive use area has been reduced significantly (see Map 2-9).

11-2 Legislation is outside of the scope of this RMP. This concern has been answered in a letter to the Canoncito Band.

11-3 The Canoncito Community currently has no permit or lease for livestock grazing on the public lands in the Rio Puerco Resource Area. Since all public lands in the vicinity of the Canoncito Community are currently adjudicated for grazing, no alternative could be developed which would provide additional forage to offset livestock reductions recommended by the BIA and implemented on the Community's lands.

12

SANTA ANA PUEBLO
Star Route Box 37
BERNALILLO, NEW MEXICO 87004

Office of the:
Governor Eliseo Raont, Sr.
Lt. Governor Anthony Montoya
Secretary Lorinda M. Baugh

Phone: (505) 867-3301
(505) 867-3302

May 31, 1985

Mr. David Kohler
Bureau of Land Management
3550 Pan American Freeway, N.E.
Albuquerque, New Mexico 87107

Dear Mr. Kohler:

Enclosed is a petition expressing support for strict control of Off-Road vehicles and motorcycles on federal BLM Lands. We urge favorable consideration of the views expressed when land use plans are considered for the Rio Puerco Resource area. Thank you.

Sincerely,

Roy Montoya

Roy Montoya
Tribal Administrator

Enc: 3

A total of 73 signatures to this petition were received.

No substantive comments in Letter #12.

13

City of Albuquerque
P.O. BOX 1293 ALBUQUERQUE, NEW MEXICO 87103

MAYOR
Harry E. Kinney

CHIEF
ADMINISTRATIVE OFFICER
Frank A. Kleinhenz

June 4, 1985

Area Manager
Bureau of Land Management
Rio Puerco Resource Area
Post Office Box 6770
Albuquerque, N.M. 87197-6770

Dear Sir:

Thank you for the opportunity to review the Draft Rio Puerco Resource Management Plan and Environmental Impact Statement. The Planning Division has no comments to make on the Draft. We are, however, enclosing a copy of major elements of the adopted Albuquerque/Bernalillo County Comprehensive Plan for your reference. We are presently updating these documents. The updated plan should be available in about a year.

Sincerely,

Jack E Leaman

Jack E. Leaman
City Planner

No substantive comments in Letter #13.

MUNICIPAL DEVELOPMENT DEPARTMENT
Jack E. Leaman, City Planner
PLANNING DIVISION
Telephone (505) 766-7422

AN EQUAL OPPORTUNITY EMPLOYER

14

New Mexico
WILDERNESS STUDY COMMITTEE

1004 Palisades NW
Albuquerque, NM
June 24, 1985

Herrick E Hanks, Area Manager
Rio Puerco Resource Area
Bureau of Land Management

Dear Herrick Hanks:

Here are some comments and recommendations on the Rio Puerco RMP from the New Mexico Wilderness Committee:

Congratulations to you and your staff for putting together such a well-researched, detailed, and attractive document. In general, we support Alternative B or D.

We are for your recommendation to close the four roads(ways) in the Ignacio Chavez--Chamisa area (map c-21), the road which constitutes the north boundary of Ojito WSA (C-34. map c-16), and the resulting increase in primitive and semi-primitive non-motorized land in ROS Area I (map I-5).

The southern 1/4 of the RMP area is all that remains that is mainly semi-primitive non-motorized zones. These zones are constantly shrinking, and by definition, cannot increase. (They are ever being diminished by inroads for mineral and oil & gas exploration and ORV encroachment --illegal tracking, whether from recreational or woodcutting activities.)

Recreational ORV use should be shunted to the northern 3/4 of the RMP area,

which is predominantly mapped as semi-primitive motorized. These ORV users are a recognized reality and should be accommodated where they will have the least impact on roadless areas. Plots and courses should be laid out for them, and they should be confined to the designated tracks in those areas. They should be kept and oriented far away from Wilderness Study Areas. They have already done much illegal tracking and destruction in the Ojito WSA. (Where they were lured by the "Oh My God 100" and illegal woodcutting roads.)

The damage which ORVs do to the fragile Rio Puerco region soils is obvious and could and should be documented by the BLM. This to show that ORVs should not be permitted off roads anywhere in the RMP area. Besides, the first track always leads to another and another!

Close the road (way) complex in the central part of "El Malpais" (just below the printing of "El Malpais" on map 2-16) and a large "primitive" zone would result. (What little that needs ranch attention in that lava area via these ways could be accomplished on horseback.)

Keep roads, ways, and ORVs away from cultural Resource sites as much as possible. ROADS=PEOPLE=DESTRUCTION

Sincerely
Jim Stewart

Jim Stewart, Chairman
New Mexico Wilderness
Study Committee

No substantive comments in Letter #14.

15

(Typed for Reproduction Purpose)

Albuquerque Archaeological Society
P.O. Box 4029
Albuquerque, NM 87196

June 25, 1985

Area Manager
Bureau of Land Management
Rio Puerco Resource Area
P. O. Box 6770
Albuquerque, NM 87197

Dear Sir:

I am writing on behalf of the Albuquerque Archaeological Society in response to your request that we review and comment on your Draft of the Rio Puerco Resource Management Plan.

We applaud your efforts to attempt to integrate all the area's resources into one unified program of management and have no disagreement with your choice of plan considering all the alternates. We do not have any significant questions to raise, or arguments, nor do we propose any additions, changes or deletions.

Our primary concern, that I am sure we share with you, is that, as an archaeologically interested group, we are tremendously interested in the protection and preservation of all the cultural resources in the area. We assume that management policies have been instigated to ensure the maximal protection of the historic and prehistoric resources within the constraints of available staff and funds. Hopefully, a larger budget will one day be forthcoming and patrolling of the area can be conducted on a more frequent and a more regular basis.

Sincerely,

/s/Elizabeth M. Garrett
(President)

No substantive comments in Letter #15.

16

Natural Resources Defense Council, Inc.

25 KEARNY STREET
SAN FRANCISCO, CALIFORNIA 94108
415 421-6561

Washington Office
1350 NEW YORK AVENUE, N.W.
SUITE 300
WASHINGTON, D.C. 20005
202 783-7800

New York Office
122 EAST 42ND STREET
NEW YORK, N.Y. 10168
212 949-0049

June 21, 1985

Herrick E. Hanks, Area Manager
Bureau of Land Management
3550 Pan American Freeway NE
P.O. Box 6770
Albuquerque, NM 87197-6770

RE: Rio Puerco Resource Management Plan

Dear Rick:

These comments are submitted on behalf of the Natural Resources Defense Council, Inc. (NRDC), a non-profit environmental organization with 48,000 members nationwide. NRDC has participated in the scoping process for the Rio Puerco Resource Management Plan (RMP) and Environmental Impact Statement (EIS), and we appreciate this opportunity to comment on the draft plan.

I have carefully reviewed the draft plan and EIS, which evidently are the product of much time and effort. Unfortunately, while substantial paperwork has been generated, the proposed plan does not serve its essential function, which is to guide and control future management in the area. The proposed plan, as well as the alternatives, are so generalized and lacking in specifics that they would allow the Bureau unconstrained discretion in managing the public lands. For this reason, the draft RMP is not an adequate plan, as that term is used in the Federal Land Policy and Management Act (FLPMA), 43 U.S.C. § 1712, and the Bureau's regulations. In similar fashion, the Bureau's environmental analysis is woefully short on specifics, and also lacks certain information, such as estimates of grazing capacity, that is necessary for reasoned decision-making. In sum, we believe that both the RMP and EIS should be substantially revised.

The RMP

A resource management plan (RMP) is designed to be a comprehensive document that will govern all future uses of the public lands. Both FLPMA and the Public Rangelands Improvement Act (PRIA) explicitly require the BLM to manage the lands "in accordance with" RMPs. 43 U.S.C. §§ 1732(a), 1903(b). The Bureau's regulations specify that RMPs must establish specific objectives and constraints that will guide and control future management actions. 43 C.F.R. § 1601.0-5(k). In particular, the plan must provide for the allocation of forage among livestock, wildlife, and other competing uses. Id. § 4110.2-2(a). The draft Rio Puerco RMP is so generalized
16-1 that it fails to comply with these requirements.

The proposed plan is most specific with respect to the designation of "special management areas" (SMAs). In general, we support the Bureau's proposed designations and its recognition that the area contains unique and valuable resources that merit special protection. In Appendix C, the Bureau describes the various SMAs and sets forth management objectives and planned actions for the areas. For the most part, the objectives and actions are specific enough to guide the development of more detailed activity plans for management of the areas.

16-2 Unfortunately, the draft plan provides almost no specifics with regard to areas not included in SMAs, particularly allotments grazed by livestock. The plan fails to establish allocations of forage among competing uses, as required by the Bureau's regulations. 43 C.F.R. § 4110.2-2(a); see also 43 Fed. Reg. 58764, 58766 (Dec. 15, 1978) (plans must establish "desired allocations of forage"). In addition, the plan fails to "prescribe the type of livestock...management needed to insure accomplishment of the planned forage uses," 43 Fed. Reg. at 58766, and to describe in any detail "the manner and extent to which grazing is to be permitted on the allotment in order
16-2 (cont) to meet the multiple-use objectives set forth." Dahl v. Clark, 600 F. Supp. 585, 587 (D. Nev. 1984).

In fact, while the draft plan contains specific proposals with respect to numbers of livestock (AUMs), it fails even to mention, much less to specify, other necessary conditions of grazing, such as seasons of use, permissible forage utilization levels, and grazing systems. While we recognize that the Bureau will issue or renew more detailed grazing permits or allotment management plans, it is essential that the RMP establish the basic conditions of livestock use. The draft Rio Puerco RMP is far too generalized to serve this purpose.

We are particularly concerned that the RMP fails to specify how conflicts between livestock and wildlife will be resolved. Thus, while the draft notes numerous conflicts, particularly between expanding elk herds and cattle, e.g., p. 3-13, p. 4-4 and Table 4-1, it fails to propose any specific
16-3 resolution of these conflicts, other than designation of certain SMAs. Id. p. 4-39. Moreover, even with respect to the SMAs, the draft plan fails to propose any constraints on livestock use that will lessen the conflict with wildlife. Id. pp. C-20 (Ignacio Chavez), C-30 (Tent Rocks). We urge the Bureau to address this issue more squarely in the final plan by requiring

16-3 (cont) measures that will reduce or otherwise modify livestock use in these areas in order to avoid unnecessary conflicts with wildlife.

16-4 Finally, with respect to areas covered by earlier grazing EISs, the draft plan is also extremely vague in describing any constraints or other limitations on grazing use. *See* Appendices A & B. In order to be a comprehensive plan, the Rio Puerco RMP must set forth in greater detail the specific objectives and constraints on grazing use, including allocations of forage, required by earlier plans. If the earlier plans lack this amount of detail, they are inadequate for the same reasons described above and cannot be incorporated into the RMP.

The EIS

The Rio Puerco RMP/EIS is designed to satisfy the Bureau's obligation under the National Environmental Policy Act (NEPA) to prepare site-specific grazing EISs, as required by the court in *NRDC v. Morton*. We recognize that the area contains numerous scattered tracts that make comprehensive management and analysis difficult. However, this difficulty does not justify preparation of an EIS that lacks essential information and specific proposals and alternatives for grazing management. Unfortunately, it does not appear that the EIS as written will serve any useful purpose in determining future management actions.

The proposals and alternatives in the draft EIS are unreasonably vague. The judgment in *NRDC v. Morton* requires the Bureau to analyze the environmental impacts of particular grazing permits, and all reasonable alternatives. Under the Bureau's regulations, permits must contain livestock numbers, seasons of use, utilization levels, and, where necessary,

grazing systems. 43 C.F.R. §§ 4130.6, 4130.6-1, 4130.6-2. Accordingly, these same terms and conditions must be analyzed in the EIS.

16-5 The proposals in the Rio Puerco EIS, however, specify only numbers of livestock. None of the proposals or alternatives address the season of use, utilization level, or grazing system for any allotment. Instead, these essential terms are simply ignored in the EIS. We are particularly concerned by the omission of proper seasons of use, since the EIS reveals that much of the area is grazed year round. While the EIS does describe in general terms the kind of grazing systems and range improvements that will be considered, *see* Appendices N & O, it fails to propose any specific improvements or systems for particular allotments, as required by *NRDC v. Morton*.

16-6 An adequate EIS would not only contain specific proposals with regard to numbers, seasons of use, etc., but would also contain a reasonable range of alternative terms and conditions. The Rio Puerco EIS fails to address any term other than livestock numbers. But even the alternatives with respect to AUMs are insufficient, since they are all virtually identical, indicating that the Bureau has already determined to make no significant change in livestock use. Because one key purpose of the EIS is to involve the public in the decision-making process, the EIS should contain a range of alternatives, including, at a minimum, an alternative involving a meaningful reduction in livestock numbers.

16-7 The lack of specific proposals and alternatives in the EIS may reflect the lack of data deemed necessary for making grazing decisions. Section 15 lands have been completely ignored. The Bureau has apparently not even examined these areas, much less conducted a thorough resource inventory.

16-7 (cont) However, without any data, how can the Bureau even place these lands into management categories? Even Category C requires the Bureau to find that there are "no significant resource conflicts." EIS, p. L-1. The Bureau apparently has no basis for determining that this criterion has been met for section 15 lands. 16-8 Moreover, while we can understand the Bureau's unwillingness to make costly range improvements in such scattered parcels, this does not explain the failure to implement any necessary reductions, changes in seasons of use, or similar actions. In sum, while we do not support the expenditure of significant resources on the scattered section 15 lands, we believe that it is not acceptable simply to ignore those lands and the resource problems that may exist there.

Our primary concern is not with the section 15 lands, but with the blocked parcels of section 3 lands such as the Ball Allotment, the Allotment 114, and the Tent Rocks areas. In such areas, the Bureau is required to insure that authorized grazing use does not exceed estimated grazing capacity. 43 C.F.R. § 4130.6-1. In order to comply with this requirement, the Bureau must estimate grazing capacity for specific allotments; because this information is essential to reasoned decision-making, NEPA requires that it be included in the EIS. The Bureau has long based such estimates on the same kind of inventory data available in this case, and in fact did so in the earlier Rio Puerco Grazing EIS. 16-9 If the Bureau no longer believes such data are adequate, it has a duty to acquire the necessary information, use it to estimate grazing capacity, and provide these estimates in the EIS.

16-10 According to the draft RMP, specific grazing reductions must await the gathering of monitoring data. The plan should

16-10 (cont) specify precisely what kind and amount of data are needed. See 43 C.F.R. § 1601.0-5(k)(8) (requiring "intervals and standards for monitoring"). Further, I understand from my tour last year that monitoring studies were initiated in some areas in 1983, when the inventory took place. If so, the Bureau should already have two years of monitoring data. 16-11 Are monitoring studies ongoing in all section 3 lands? How much more data are needed? When will grazing decisions be issued?

In sum, while we recognize the effort that went into preparing the draft plan and EIS, we strongly believe that the document must be thoroughly revised in order to serve a useful function and comply with legal requirements. However, we do support the Bureau's designation of SMAs as well as the proposed reductions in livestock numbers in order to improve range conditions. Please contact me if you have any questions. Thank you for considering these comments.

Sincerely,

David B. Edelson
Staff Attorney

DBE:hw

Responses to Comment Letter #16.

16-1 See the response to comments concerning the lack of specificity in the Draft RMP, located at the beginning of this section.

16-2 Forage is currently allocated among the competing uses in the vegetative uses issue area. The RMP vegetative uses issue examines the correctness of these allocations and defines a process to identify and implement needed grazing management changes.

Ecological condition data were collected in accordance with the methodology prescribed in the Soil Conservation Service (SCS) National Range Handbook and in compliance with BLM Washington Office Instruction Memorandum No. 83-340 for the Section 3 permitted grazing allotments. Stocking rates, both current and those recommended by SCS, were calculated and assessed for the Section 15 leased grazing allotments. Based on the analysis of the ecological condition for the Section 3 permitted allotments and stocking rate data for the Section 15 leased allotments, resource conflicts were identified and the grazing allotments in the issue area were placed into one of three selective management categories in accordance with Washington Office Instruction Memorandum No. 82-292. The selective management categorization process was used to identify those allotments on which current management is not meeting multiple use needs and demands.

However, the data available are not adequate to specify the management changes (reductions in livestock grazing, types of grazing systems, changes in season of use, and range improvements) needed to meet multiple use objectives. Therefore, in accordance with 43 CFR 4110.3-3 which states: "If data acceptable to the authorized officer to support an initial reduction are not available, additional data will be collected through monitoring studies," a five-year program of vegetative monitoring studies has been initiated. These monitoring studies will provide the vegetative, condition, trend, utilization patterns, percent utilization, precipitation, and actual use data needed to specify the proper management changes best suited for an individual allotment to meet the multiple use objectives of the approved RMP.

Based on the monitoring studies data, forage will be reallocated to competing uses and Allotment Management Plans (AMP's) will be developed, where appropriate. These AMP's will specify utilization levels, season of use, and type of grazing system, and will identify the types and locations of needed range improvements. See Appendix S in the Draft for current base conditions of livestock use (e.g., season of use, class of livestock). These AMP's will be developed in consultation, coordination, and cooperation with affected and interested parties (e.g., grazing allottees, other government agencies, and special interest groups) as required by the Public Rangelands Improvement Act of 1978. In addition, Resource Area specialists, including but not limited to the wildlife biologist, and the watershed specialist, will be involved in the development of these plans to ensure that the management prescriptions provide for the resolution of resource conflicts in a manner consistent with the objectives of the approved RMP. The response to comments about lack of specificity in the RMP at the beginning of this section provides further information concerning activity plan development and compliance with NEPA requirements for these plans.

The RMP, therefore, provides the framework to ensure that the vegetative resources in the issue area are managed in accordance with all pertinent laws, regulations, and policies through the implementation of sound resource management principles and practices, consistent with the multiple use objectives of the approved RMP.

16-3 Conflicts between wildlife habitat and livestock grazing use were identified based on ecological data. Unacceptable ecological condition was considered to be the indicator of conflicts between livestock grazing use and wildlife habitat. Based on vegetative monitoring studies results, forage will be reallocated to meet livestock grazing use and big game wildlife habitat needs. Activity plans (AMP's for grazing and Habitat Management Plans [HMP's] for wildlife) will also be developed to assist in the resolution of these resource conflicts. AMP's would be developed to ensure that wildlife habitat forage requirements would be sustained, to improve ecological condition, and to ensure that grazing systems and proposed range improvements complement wildlife habitat management. HMP's will be developed for critical big game habitat where no plans currently exist (e.g., Tent Rocks area); implementation of existing plans (e.g., Ignacio Chavez Grant area) will continue. See the response to Comment 16-2 for additional information on AMP development and the response concerning lack of specificity at the beginning of this section for additional information on activity plan development.

In the Tent Rocks area, critical elk winter range was identified as occurring on one grazing allotment, La Jara 0066. Grazing use has been one fifth of the allowable livestock grazing use on this allotment for the last five years and this trend in livestock use is anticipated to remain unchanged for the immediate future. This limited use provides for reduced conflicts between livestock and elk use, and should ensure that elk habitat forage needs are provided in this critical winter use area until activity plans can be developed and implemented.

Conflicts between livestock grazing use and wildlife habitat will be resolved in accordance with the multiple use objectives of the approved RMP through development and implementation of activity plans, and reallocation of forage where appropriate.

16-4 Appendices A and B in the Draft were not intended to replace the prior grazing EIS or Management Framework Plan (MFP) decisions. This RMP/EIS incorporates applicable land use planning decisions contained in the MFP's and EIS's (see page 1-1 of the Draft). The appendices were intended only to be summaries of these decisions. The analyses, specific objectives, and constraints established in these documents are still in effect to guide the development and implementation of their decisions.

These documents were developed in sufficient detail and within the guidelines and constraints appropriate at the time of their development. The MFP's contain very specific decisions which were developed with the full opportunity for public participation. However, those MFP decisions which are no longer appropriate or which were reanalyzed in this RMP were not brought forward. The grazing EIS's were developed under the guidelines established in the National Environmental Policy Act of 1969 and in compliance with the Final Judgement of the NRDC et al. v. Morton et al. lawsuit (Civil No. 1983-73). See the response to comments about lack of specificity at the beginning of this section for additional information on prior EIS's and land use planning decisions.

The decisions and proposed actions carried forward from these documents are still considered viable and their continued implementation will result in improved management of the public lands.

16-5 The response to Comment 16-2 describes how AMP's will be developed to initiate the management changes (e.g., season of use, utilization levels, type of grazing system, and type and location of range improvements). Deferral of the development of the AMP's until adequate vegetative data have been collected through monitoring studies will improve the quality and effectiveness of management changes implemented. For example, the type of grazing system, and type and location of range improvements would be better suited to the specific environmental situations for each allotment, resulting in more cost-effective improvement in ecological condition and resolution of resource conflicts, whereas development of specific management changes based on current data would be less effective in improving ecological condition and resolving resource conflicts.

In addition, an environmental analysis will be completed for each AMP prior to its approval for implementation. The public will be encouraged to review and comment on these AMP's and associated environmental analyses. The environmental analysis for these AMP's will be consistent with the guidance set forth in the NEPA regulations (40 CFR 1508.28). The response to comments about specificity at the beginning of this section discusses in greater detail tiering of environmental analysis as prescribed in the NEPA regulations, as well as the RPRA policy on public participation in activity plan development.

The RMP provides for the implementation of management changes through the development of AMP's and environmental analyses (with public review), ensuring that the public lands in the vegetative uses issue area are managed in accordance with the settlement of the NRDC v. Morton lawsuit.

16-6 The response to Comment 16-2 discusses the application of selective management categorization. Nine of the sixteen Section 3 permitted grazing allotments in the vegetative uses issue area are in the "I" category. These nine are the allotments on which management changes and/or reductions in allowable livestock grazing use are needed to improve ecological condition and resolve resource conflicts.

Alternative B would place the greatest restrictions on livestock grazing use. Reductions in allowable livestock grazing use are estimated to be 1898 AUM's under this alternative. These estimated reductions would range from 17% to 61% of the current allowable grazing use for these allotments. In addition, AMP's would be developed for these allotments for the purposes of improving ecological condition and resolving resource conflicts.

We therefore believe that Alternative B provides a meaningful grazing management option that favors the improvement of wildlife habitat and watershed conditions over livestock grazing use, and provides for significant reductions in allowable livestock grazing use.

16-7 Three factors were considered prior to the placement of the Section 15 leased grazing allotments in the "C" selective management category. A stocking rate analysis was conducted by comparing the current stocking rate with the stocking rates recommended by SCS in their range site guides for these allotments. This analysis was intended to ensure that the current stocking rates were reasonable and prudent. Secondly, the total acres of public land were considered, with allotments containing fewer than 1540 acres of public land considered to be too small for implementation of cost-effective changes in grazing management.

Also, the Resource Area specialists were asked to identify specific resource concerns which could warrant changes in current grazing management on Section 15 allotments. None were identified. The Management Situation Analysis (MSA) companion document details this process. The response concerning lack of specificity at the beginning of this section describes in detail the relationship of the MSA to the RMP/EIS.

We believe that application of these three considerations establishes sufficient basis to place allotments in the "C" selective management category. If new data become available which indicate that there are significant resource conflicts on any of these grazing allotments, the selective management category will be changed and the allotment(s) will be managed in accordance with objectives of the approved RMP.

16-8 The Section 15 leased grazing allotments are typically comprised of small, isolated, and scattered tracts of public land that tend to be small, intermingled parts of larger grazing operations consisting predominately of private and State lands. Consequently, the grazing leases for these allotments contain only the grazing use allowable on the public lands, whereas the permits for the Section 3 allotments contain the grazing use allowable for the whole allotment, including private and State lands. This indicates a major difference in our ability to effectively change management (season of use and stocking rates) on these two different types of grazing allotments. Wholesale changes in management on Section 15 leased allotments would require a tremendous commitment of the work force to ensure compliance. Due to funding restrictions, our management priority is to the larger, more consolidated blocks of public lands and prevents us from making a large commitment to compliance checks on the Section 15 leased lands. However, we will initiate management changes and ensure compliance on individual allotments if significant resource problems are documented.

Comment 16-7 explains the factors considered for these Section 15 leased allotments prior to their being placed in the "C" selective management category. Placement in the "C" category provides for the continuation of current management on these allotments.

16-9 The inventory conducted in the vegetative uses issue area has a different design and intent than the inventories conducted in the past. Past inventories, such as those conducted for the Rio Puerco Grazing ES were designed and intended to allocate forage. The vegetative uses issue area inventory was designed to collect the data needed to calculate ecological condition and to provide the baseline data for the establishment of vegetative monitoring studies in accordance with Washington Office Instruction Memorandum No. 82-292. The baseline inventory data, combined and analyzed with monitoring studies data, will be used in determining vegetative allocations based on individual resource needs.

Short- and long-term estimates of allowable livestock grazing use are displayed in Appendix P of the Draft RMP/EIS. These estimates were based on current ecological conditions, projected improvements in ecological conditions due to management changes, and the management objectives (priorities for the resolution of conflicts) for each alternative. Specific information concerning the development and application of the principles on which the estimates of allowable livestock grazing use were made is contained in the MSA companion document to the RMP. The response to comments about the lack of specificity in the RMP at the beginning of this section describes the relation of the MSA to the RMP/EIS.

16-10 A vegetative monitoring plan has been developed for the RPRA which will be used for the vegetative uses issue area. See the response to Comment 16-2 for a discussion of the types of vegetative studies to be conducted. This plan is a part of the MSA companion document to the RMP/EIS. The response to comments about the lack of specificity in the RMP at the beginning of this section gives further detail on the relationship of the MSA to the RMP/EIS. Additional information concerning vegetative monitoring studies is contained in the Vegetative Uses "Implementation" section in Chapter 2 of this document.

16-11 Limited vegetative monitoring studies were initiated on the Section 3 grazing allotments during the summer of 1983. The established studies are primarily vegetative trend studies used to evaluate the effectiveness of current management. Utilization and precipitation studies will be initiated following issuance of the initial grazing decisions. Additional information concerning the issuance of grazing decisions is discussed in the Vegetative Uses "Implementation" section in Chapter 2 of this document.

17

Wildlife Management Institute

Suite 725, 1101 14th Street, N.W., Washington, D.C. 20005 • 202/371-1808

DANIEL A. POOLE
President
L. R. JAHN
Vice-President
L. L. WILLIAMSON
Secretary
WESLEY M. DIXON, Jr.
Board Chairman

June 10, 1985

Area Manager
Bureau of Land Management
Rio Puerco Resource Area
P.O. Box 6770
Albuquerque, N.M. 87197

Dear Sir:

The Wildlife Management Institute is pleased to comment on DRAFT RIO PUERCO RESOURCE MANAGEMENT PLAN, New Mexico.

We urge adoption of Alternative B., Resource Conservation, because it enhances resources only at the expense of minerals. Grazing reductions and reduced ORV use will benefit wildlife. There will be no costs for range improvements.

"The estimated reductions in allowable livestock grazing use would have neglibible impacts on economic returns to the livestock operators because their actual use in the past has been less than their allowable use." Page 4-28, 4th paragraph.

We see no reason for not adopting Alternative B. It will hurt little, help much, and at low cost.

Alternative D, preferred alternative, is not acceptable because of lower wildlife benefits and because increases of a little more than 1000 AUM more than Alternative "B" will be done by an unspecified number and location or range improvements at an unstated cost to the taxpayer. Page 4-28, last paragraph, 1st column. This alternative will continue and increase the heavy rancher subsidy of the three previous and related grazing management plans.

These remarks have been coordinated with William B. Morse, the Institute's Western Representative.

Sincerely,

Daniel A Poole

Daniel A. Poole
President

DAP:sh

No substantive comments in Letter #17.

DEDICATED TO WILDLIFE SINCE 1911

18

National Council of Public Land Users

P. O. Box 811

Grand Junction, Colorado 81501

Paul Maxwell, President

P.O. Box 811

Herbert Snyder, Secretary

8 Apr 85

Mr. Henich E. Hamb
Rio Puerco Resource Area Manager
USDI Bureau of Land Management
P.O. Box 6770
Albuquerque, NM 87197 6770

Dear Sir:

The Draft Rio Puerco Resource Management Plan and Environmental Impact Statement has been reviewed and the following comments are submitted for the usual disposal.

18-1 Apparently no one in the BLM is acquainted with the importance of CLIMATE and its influence upon the environment. Otherwise, the Environmental Impact Statments would indicate the amount of annual precipitation and the amount of annual evaporation measured in understandable English terminology for the areas being considered. Undoubtedly there are many readers at the UN and few in the US.

While the average annual temperature ranges expressed in what is apparently the Celsius scale (not Centigrade) may mean something to somebody, the direct solar temperature on the land is much more significant as it results in the amount of evaporation and the amount of minerals drawn to the surface by capillary attraction,as well as its effect upon microbiotic life that feeds vegetation.

Much of the Rio Puerco resembles the Sahiel of Africa and for the same reason (overgrazing by domestic livestock) it is probably too much to expect anyone working for the BLM to recognize it.

Undoubtedly future generations will remember us for our concern for the watersheds. It is hoped they do not damn us for it, though possibly deserved.

Yours truly
Herbert Snyder
Herbert Snyder, Secretary

Copy to Natural Resources Defense Council
Public Lands Institute

Response to Comment Letter #18.

18-1 The climate of the Rio Puerco Resource Area would not be directly affected by implementation of any of the alternatives in this RMP/EIS; for this reason, it is only briefly discussed in Appendix R in the Draft. This appendix accurately describes the climate; therefore, no revisions to the text are necessary.

19

May 16, 1985

Rick E. Hanks
Bureau of Land Management
Rio Puerco Resource Area
3550 Pan American Freeway NE
P.O. Box 6770
Albuquerque, New Mexico 87197

Dear Mr. Hanks:

Since December of 1984 you have received over 200 letters protesting your intended management status change to limit off road vehicle use on public lands in the Rio Puerco Resource Area. In light of your continuing position to limit ORVs to existing roads and trails under your preferred alternative plan D of the March 1985 Resource Management Plan Draft, we must again urge you not to do this.

We therefor recommend that you continue with the current "open" ORV status as stated in alternative plan A. 19-1 We want to point out that your preferred alternative plan D is not consistent with other R.M.P.'s in the State of New Mexico. The B.L.M. White Sands Resource Area, totaling approximatly 1.6 million acres has elected to continue with the "open" ORV status. The B.L.M. defended this position since their monitoring of ORV use showed the complaints had little substance.

The main issues you have used to defend your limiting of ORV use can not go unchallenged. 19-2 To date there is no evidence whatsoever of any environmental impact, abuse or consumptive use in this area. No documentation of any environmental abuse was presented in the proposed draft.

You contend that by continuing to allow open ORV use, "Primitive Recreation" such as picnicing and backpacking would be severely curtailed. This seems extremely unfair in light of the fact that ORV recreationists are currently the largest user group of this predominately desert terrain which is ideally suited for ORV recreation.

19-3 Regarding your association of recreational ORV use to the use of ORVs for the illegal activities of firewood cutting and vandalism of private property is demeaning and unfair to ORV recreationists of New Mexico.

cont--

Finally, we would like to bring to your attention that these are public lands. Federal directives state management of these lands must provide for multiuse purpose, including recreation. Limiting ORVs to existing roads and trails in desert terrain unncessarily and severely curtails this sport.

Sincerely,

Arthur S. Colgate
Arthur S. Colgate
New Mexico Off Road Vehicle Ass.

David F. Reinig
David F. Reinig
President, Southwest Off Road Enterpriseses - motorcycles,1000+affiliates

William C Thomas
William C. Thomas
President, N. M. All Terrain Vehicle Off Roaders - 3 wheelers, 500 afls.

Tom Velasquez
Tom Velasquez, President
N. M. Off Road Racing Ass. - dune buggies & 4 wheelers - 500 affiliates

Dale E. Bobb
Dale Bobb, President, N. M. Trials Ass. - motorcycles, 100 affiliates

Stanley R Johnson V-Pres.
BOBBY J'S YAMAHA, INC.

John M. Gardner, owner
SUNRISE CYCLES

HAROLD'S HUSQVARNA

Ozie McCasland, owner
M & M HONDA

Chris O. Nietz, Sales Manager
ZIA KAWASAKI

owner-Mgr
ALBUQUERQUE YAMAHA

David Bodwell, V.P.
MOTORSPORT

cc Senator Pete V. Domenici
Senator Jeff Bingaman
Congressman Manuel Lujan, Jr.

Responses to Comment Letter #19.

19-1 See the response to Transcript Comment T-3.

19-2 See the detailed response on ORV limitations at the beginning of this section.

19-3 See the response to Transcript Comment T-2.

20

S.O.R.E. **Southwest Off Road Enterpriseses**

POST OFFICE BOX 3187
ALBUQUERQUE, NEW MEXICO 87110

May 15, 1985

Rick E. Hanks
Bureau of Land Management
Rio Puerco Resource Area
3550 Pan American Freeway NE
P.O. Box 6770
Albuquerque, New Mexico 87197

Dear Mr. Hanks:

We want alternative A of the March 1985 draft of the Rio Puerco Resource Management Plan adopted, leaving the Rio Puerco Resource Area open to off road vehicles. 20-1 You have not presented any evidence of overuse or abuse by off road vehicles to warrent limiting off road vehicles to existing roads and trails.

Ranching, coal, oil and gas leasing, mining, firewood cutting, off road vehicle recreation and motorized camping all require off road access. Of all of these the largest user group is recreational off road vehicles.

With alternative A the Bureau of Land Management has authority to close or limit areas showing signs of degradation. Alternative A provides for acquisition of right of way. Alternative A provides for emergency actions to resolve user conflicts, i.e. signs posted warning off road vehicles of private land. Selection of alternative A would require less monetary output by the Bureau of Land Management.

In our opinion alternative A, the no action plan, is the best choice for all user groups.

Sincerely yours,

David F. Reinig

David F. Reinig
S.O.R.E. President

Response to Comment Letter #20.

20-1 See the detailed ORV response at the beginning of this section, and the revised "Soil and Water Resources" section in Chapter 3.

21

①

NEW MEXICO OFF ROAD RACING ASSOCIATION
7
7
Albuquerque, New Mexico

This is a statement submitted by the New Mexico Off-Road Racing Association, Inc., hereafter referred to in this document as "The Association".

This statement is a continuation and an elaboration of the position of the association on the Draft Resource Management Plan for the Rio Puerco Resource Area, and is intended to accompany and to supplement the previously submitted document.

After reviewing the four proposed management plans (A through D), within the Draft Resource Management Plan, the association maintains its position of support for Alternative "A", the "no action" alternative. The association seeks only the use of existing roads and trails within the Rio Puerco Resource Area, and although alternative "A" would allow access to all areas within the Rio Puerco Resource Area, we reaffirm our position of not desiring to drive indescriminately over the land, but rather to stick to existing road and trail structure.

Since alternative "D", the Balanced Management Alternative, seems the most likely to be implemented, the association would also like to comment on it at this time. Under alternative "D", twenty-two SMA's are identified, also nine ACEC's and three RNA's. The association does not contest the implementation of ACEC's, or their closure to ORV use. However the potential for "closed" or "limited" status in the SMA's and RNA's is a great concern to the association. We could accept management alternative "D" if the currently "open" road and trail structure was left "as is" (open), except for implementation of the ACEC's. The association would also find alternative "D" more palatable if the BLM would stipulate to the potential and existing permit holders (i. e. grazing, gas, oil, coal, and the pipeline and electrical transmission right-of-way), that the land is open to public access despite their permit for specific use.

21-1 The association would like to see three areas within the Rio Puerco Resource Management Area designated as "ORV recreation trail systems". These areas are highlited on map number 1-1 (see attached maps). Under this designation of "ORV recreation trail systems" the association is asking for: (1) improved access to these areas; (2) improvements to existing road structure within these areas; (3) site improvements (i.e. picnic tables, trash cans, or camping sites), whose site locations would be mutually determined by the BLM and the association at a future date.

The association endorses the proposed creation and development of the "Competitive Dune Buggy Event Area", (see map 1-2) and will lobby the New Mexico Senators and Congressmen for its continued existence. 21-2 However there are two main areas of concern: (1) there is no access to this area over the (approximate) final two miles of road approaching the area, about which we ask the BLM to negotiate for access rights; (2) The current BLM position of no modification of road structure must be amended to allow designated passing areas, or widening of the roads and trails to allow passing throughout the course.

The BLM has proposed that the use of this "Competitive Dune Buggy Event Area" will be on a permit basis, and the area will be available to the association four (4) times per year. 21-3 Since the association holds events eight to twelve times per year depending on the severity of winter weather, the association would like to see this area open for use at least eight (8) times per year. Since it is probable that the BLM will be unable to get the grazing permit holders in this area to co-operate on an eight to twelve event per year schedule, the association would like to suggest to the BLM two additional

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21-3 (cont) competitive event areas that would take pressure off of the proposed competitive event area, and would be used less frequently and be less impacted by ORV use than the designated Competitive Dune Buggy Event Area. These two additional areas are highlited in map number 1-3. The association would probably only access these areas two times each per year on a permit basis, due to their remoteness from the Albuquerque metropolitan area.

In summary, let me reiterate the associations position: Under the proposed Draft Resource Management Plan the association can only support alternative "A". IF ALTERNATIVE "D" WERE MODIFIED TO ALLOW THE FOLLOWING CHANGES, IT WOULD BE VIEWED AS ACCEPTABLE BY THE ASSOCIATION. The modifications would be; (1) allow all road and trail structure to remain "open", except for ACEC's; (2) "ORV recreation trail systems" were improved to allow for (a) better access (b) improved roads and trails (c) picnic or camp sites constructed. (3) the two items of concern about the Competetive Dune Buggy Event Area can be negotiated; (4) two additional competitive event areas were developed for limited use, to allow a total of eight to twelve events per year to be held.

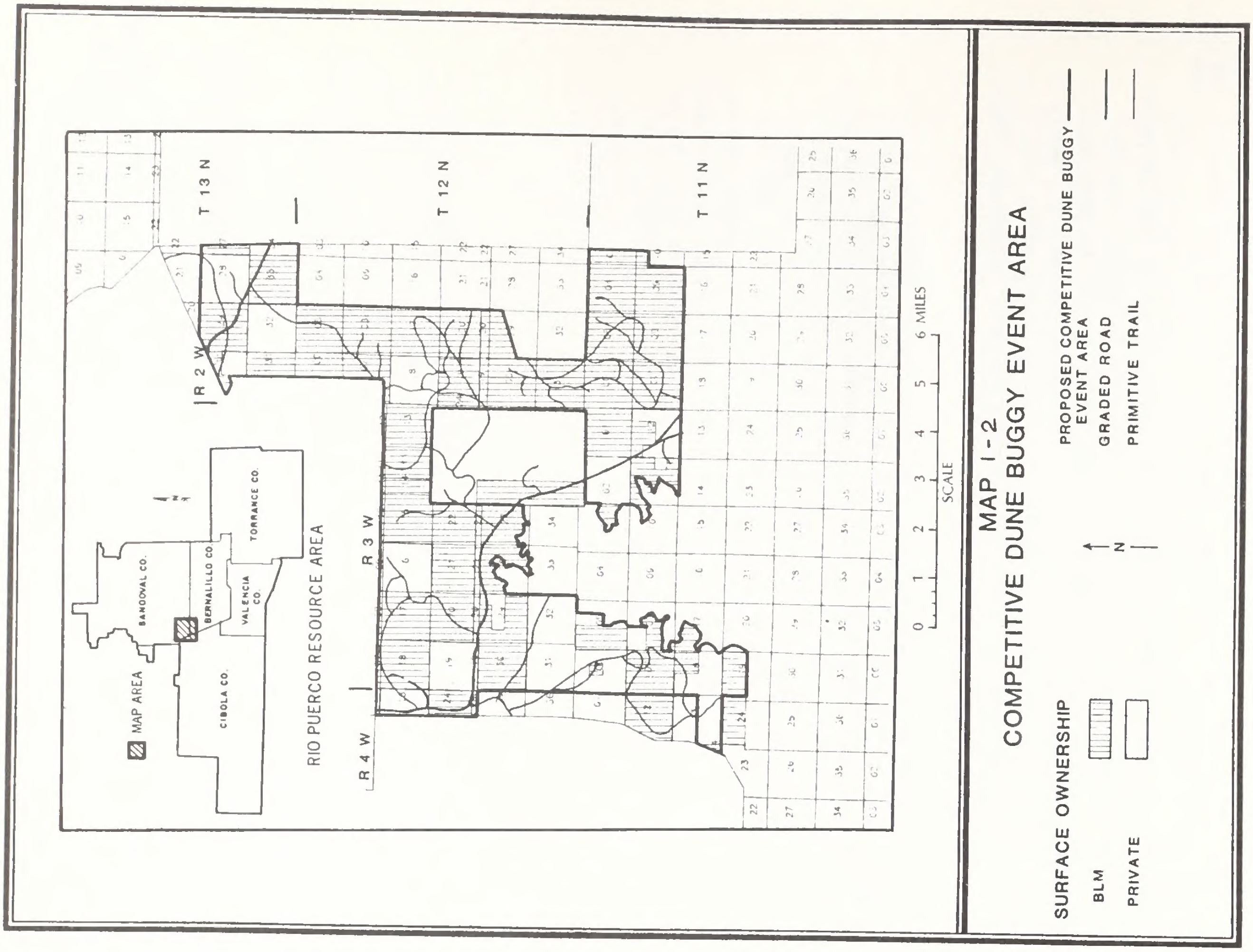
Thank you for your consideration.

N.M.O.R.R.A. President Tom Velasquez
Tom Velasquez

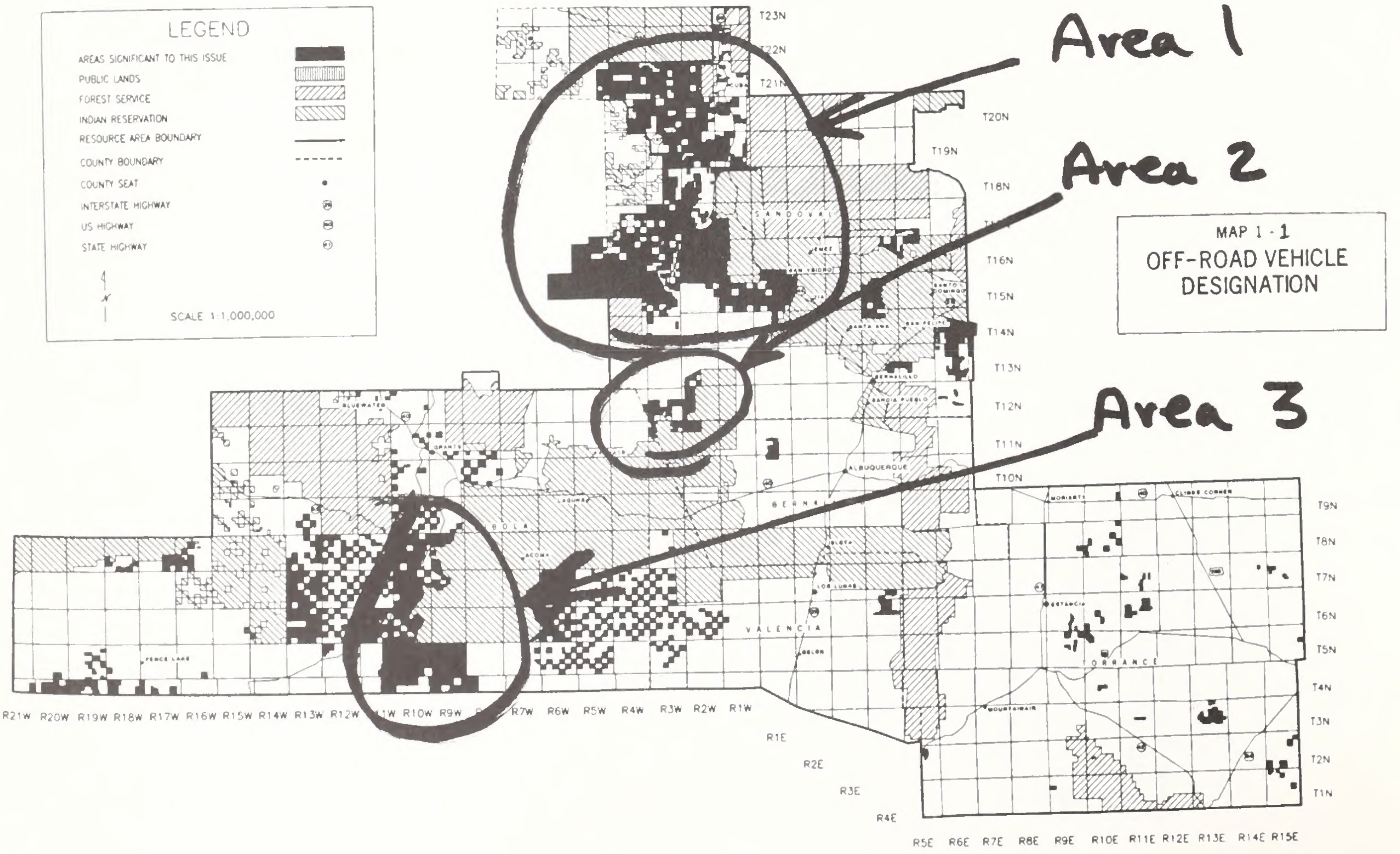
N.M.O.R.R.A. Vice President
Bob Gayton

BLM Land Use Committee Chairman Blair Johanson
Blair Johanson

BLM Land Use Committee Vice Chairman Ralph J. Parrick
Ralph Parrick


MAP 1-2
COMPETITIVE DUNE BUGGY EVENT AREA

RIO PUERCO RESOURCE AREA


MAP 1 - 1
OFF-ROAD VEHICLE DESIGNATION
LEGEND
AREAS SIGNIFICANT TO THIS ISSUE
PUBLIC LANDS
FOREST SERVICE
INDIAN RESERVATION
RESOURCE AREA BOUNDARY
COUNTY BOUNDARY
COUNTY SEAT
INTERSTATE HIGHWAY
US HIGHWAY
STATE HIGHWAY
N
SCALE 1:1,000,000
Area 1
Area 2
Area 3
SANDOVAL
BERNALILLO
ALBUQUERQUE
VALENCIA
TORRANCE
ACOMA
LAGUNA
MORIARTY
ESTANCIA
MOUNTAINAIR
BELEN
LOS LUNAS
T23N T22N T21N T20N T19N T18N T16N T15N T14N T13N T12N T11N T10N T9N T8N T7N T6N T5N T4N T3N T2N T1N
R21W R20W R19W R18W R17W R16W R15W R14W R13W R12W R10W R9W R7W R6W R5W R4W R3W R2W R1W
R1E R2E R3E R4E R5E R6E R7E R8E R9E R10E R11E R12E R13E R14E R15E

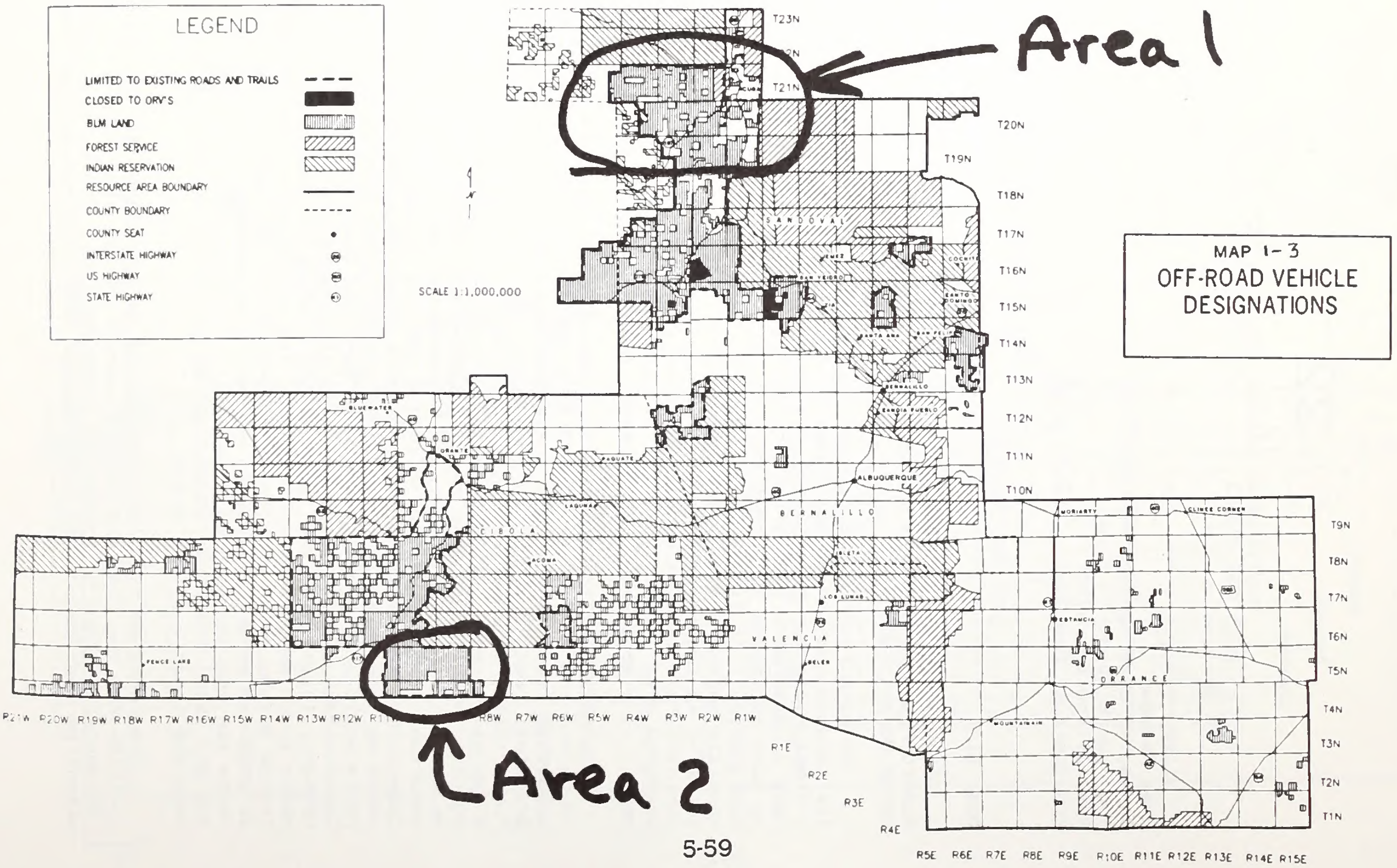
Responses to Comment Letter #21.

21-1 The entire RPRA is available for expansion of the identified ORV Recreation Trail System (see Pocket Map E in the Draft). Exact locations will be the subject of a site-specific plan, as will such considerations as access, facilities, and maps and brochures. This site plan will be prepared with full public participation.

21-2 See the response to Transcript Comment T-6.

21-3 The Competitive Dune Buggy Event Area shown on Map 2-9 would be available for use four times per year; however, the BLM will consider other competitive dune buggy event areas on a permit basis.

RIO PUERCO RESOURCE AREA



22

CONTINENTAL DIVIDE TRAIL SOCIETY
P.O. Box 30002 Bethesda, Md. 20814

May 3, 1985

Area Manager
Bureau of Land Management
Rio Puerco Resource Area
Post Office Box 6770
Albuquerque, New Mexico 87197-6770

Re: 1610(017)

Dear Sir:

Thank you for the opportunity to comment on the draft Rio Puerco Resource Management Plan and Environmental Impact Statement, dated March 1985.

We have reviewed the draft primarily from the perspective of its impacts upon the Continental Divide National Scenic Trail. As a final route for the CDT has not been designated, the Plan must make a reasonable effort to mitigate adverse impacts upon the Trail at such locations as seem likely to be considered for formal designation. It is especially important, in this regard, to focus upon the segment between Cuba and Grants - both of which are likely to serve as important resupply points for Trail users. The northern half of this stretch is contained in the Rio Puerco Resource Area - and it is this portion that needs to be reviewed here. (The southern half is nearly all national forest land.)

We note that the draft plan undertakes to identify a possible route for the CDT in the Cuba-Grants segment. (Map C-19) That suggested route is entirely unsatisfactory, as it appears to follow principal roads and highways: it should be ruled out altogether. Fortunately, it appears that an excellent treadway can be located, a few miles west, on public land. We are enclosing a map that depicts this route. Some of the recreational opportunities to be enjoyed along such a Trail are the Canon Jarido - which would be an important water source for hikers - and the Headcut Prehistoric Community. (Acquisition of non-public lands here, as proposed, would be beneficial in securing an uninterrupted travelway.) The route would also pass close by the San Luis Mesa raptor area and Cabezon Peak. While there are several options past Cabezon, the historic interest of the 1870's wagon road trail would warrant its being given serious consideration. Its inclusion in the New Mexico Trails System, with limitation to pedestrian and equestrian use - as proposed by the draft plan - would also enhance its value as a route for the Continental Divide Trail. After several miles along the old wagon trail, it should not be difficult to turn southward into the Ignacio Chavez Grant.

22-1 The route we have outlined should be considered as a probable location for the CDT, and other elements of the plan should be reexamined to take this location into account. Above all, special attention must be paid to the proposed NMGS right-of-way corridor,

as it appears on Map B. 22-2 We would have preferred that it travel nowhere near Cabezon Peak - as it is sacrilegious to tamper with the vistas shown so effectively by Simpson and Macomb over a century ago. The least damage would probably be done by running the line as far east of Cabezon Peak as possible.

22-3 The worst element of the transmission line, insofar as the CDT is concerned, would be north of Cabezon. The suggested north-south corridor alternative in R2W would result in a major adverse impact upon the Trail. For a dozen miles or more, the CDT and the power line would run parallel, and the power line would usually be in clear view. Since, according to page xiii, corridors would be designated as preferred locations for future transmission line placements, BLM should make sure that the corridor in this instance is eliminated or moved several miles to the west. (We don't understand how the corridor in question ever got into the plan in the first place. We have gone back to consult the EIS for the NMGS [BLM NM-83-001-5000, Nov. 1982] and can find no such corridor shown in that document. Before any new corridor is selected, even to be reserved for future placement, it must be the subject of an environmental impact statement - with far more analysis than appears in the draft RMP and EIS currently being circulated.)

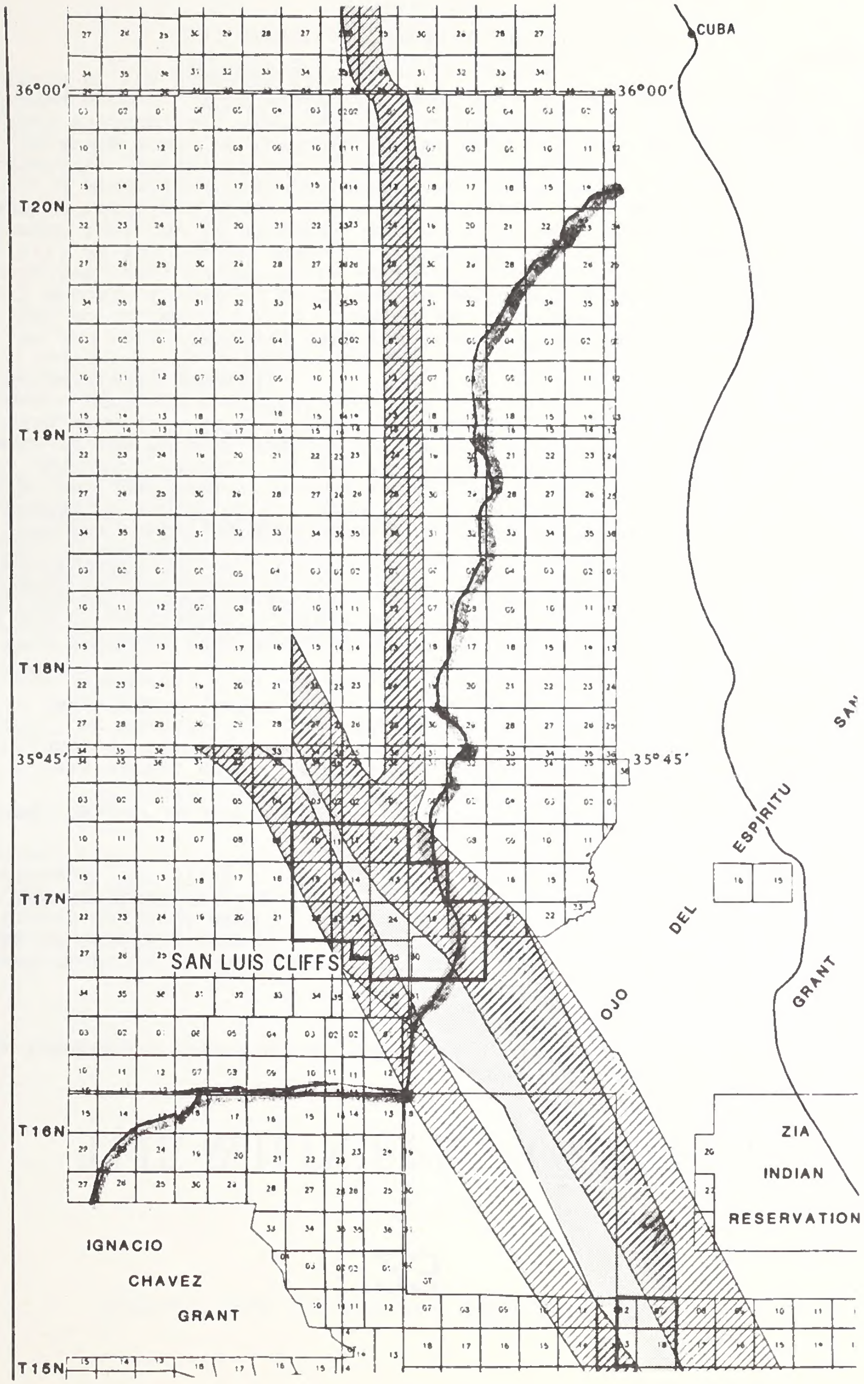
22-4 The location shown on Map C-19 for the CDT south of Grants - once again on roads - is also unsatisfactory. The plan should be revised to eliminate any suggestion that this would be the route. The best option would include portions of the Cibola National Forest (perhaps via the Zuni Mountains and El Morro National Monument). There are several possibilities, however; so for this stretch it would simply be best to provide for the development of an activity plan, which should include the selection of a route.

22-5 With respect to the text at page C-39, it should be noted that the 50-mile corridor on either side of the Continental Divide was not explicitly established by Congress. That is the width which, with the advice of the CDNST Advisory Council, is expected to be included in the Forest Service's comprehensive plan for the Trail. Further, the Advisory Council [not "Committee"] is an advisory body, and so the reference to its "approval" of the treadway is not exactly correct.

We appreciate the fact that the draft RMP recognizes the Continental Divide National Scenic Trail as a special management area. If the changes proposed above are accepted, we would regard the document to be satisfactory in its broad features. We agree that detailed management plans would still need to be developed during activity planning (as stated on page C-1) and request the further opportunity to be involved in such planning.

Sincerely,

James R. Wolf
Director



Responses to Comment Letter #22.

22-1 Following a meeting with a representative of the Continental Divide Trail Society, the route presented on revised Map C-19 has been agreed on by the Society and BLM.

22-2 Since the WSA is not included in the corridor, no transmission lines would be constructed through it. The corridor near Cabezon (T. 16 N., R. 2 W.) has three transmission lines, including two 345 kV lines, as well as four gas lines and one telephone line, already existing. The corridor is almost six miles wide, providing ample room to position future transmission lines to minimize visual impacts. Furthermore, a site-specific environmental analysis would be necessary before a transmission line were to be constructed in the corridor.

22-3 Pocket Map B is incorrect; the north-south corridor in Range 2W is not part of the New Mexico Generating Station proposal. However, there is an existing 115 kV line in this corridor. This map is reprinted with corrections and additions in this document.

The BLM rights-of-way manual (BLM Manual 2801.11C) states: "An existing transportation and utility corridor may be designated as a designated right-of-way corridor without further review" and defines a transportation and utility corridor as "a parcel of land...that is being used as the location for one or more transportation or utility right-of-way." However, before any new transmission lines are constructed in this corridor, additional site-specific environmental analysis including an EIS, if appropriate, will be required.

22-4 Map C-19 has been revised to identify a modified corridor for the Continental Divide Trail. A site plan will identify the specific trail location. Location directly next to a road will be avoided. Following consultation with the Forest Service, State of New Mexico, and the Continental Divide Trail Society, it has been decided that the Continental Divide Trail south of Grants will retain its original location. It offers the user the experience of a lava flow, the largest natural arch in New Mexico, viewing of a Chacoan outlier archeological site, a scenic overlook, and a possible water supply location. The corridor has been extended southeast along Cebolla Canyon, as discussed. The Continental Divide Trail has also been extended north toward Cuba, as suggested.

22-5 The text has been revised.

23

THE WILDERNESS SOCIETY

June 28, 1985

Herrick E. Hanks, Area Manager
Bureau of Land Management
Rio Puerco Resource Area
3550 Pan American Freeway, NW
Albuquerque, NM 87197

Dear Mr. Hanks,

Please accept these comments on behalf of the 135,000 members of the Wilderness Society, approximately 1,200 of which reside in New Mexico. Our members are very concerned with management of New Mexico's public lands and we welcome the opportunity to comment on the Draft Resource Management Plan for the Rio Puerco Resource Area.

The Resource Area contains some truly outstanding wild areas that are of particular interest to our members. These areas, many of which are Wilderness Study Areas (WSA's), are a priceless resource that should be given the maximum amount of protection possible.

The few remaining wild areas in the Resource Area are being used by an increasing number of citizens. Unfortunately, some of these users, such as off road vehicle enthusiasts, miners, ranchers, and others, can cause permanent damage. As New Mexico continues to grow in population, threats to the natural quality of the Resource Area will undoubtedly increase as well. It is critically important that you put in place very stringent protective controls now, so that the future onslaught of use can be carefully managed.

23-1 We are very concerned that the Preferred Alternative and, indeed, even the so called Resource Conservation Alternative recommends such a paltry amount of land to be closed to motorized vehicles. Under either alternative, only 10,248 acres would be closed, an area that represents only 1.1% of the public lands in the Resource Area. Instead, we recommend that the 22 proposed Special Management Areas (SMA's) be closed to motorized access except on a case by case basis under carefully prescribed circumstances where there is no reasonable alternative. If the 22 SMA's were closed to vehicles, a total of about 426,636 acres would be involved - less than half the Resource area. At the very minimum, all WSA's in the Resource Area should be closed to motorized access. This would represent only 296,491 acres - about one-third of the Resource Area.

234 N. CENTRAL AVE. — SUITE 650, PHOENIX, AZ 85004
(602) 256-7921

Off road vehicles cause clear and demonstrable damage to vegitation, soils, wildlife, and other natural values. They also hinder solitude and opportunities for primitive recreation. This type of potential damage has been clearly demonstrated by Jan Cummings and Arthur Loy in the Rio Puerco Resouce Area (the damage resulting from the "O My God 100" is particularly disturbing) and by many other researchers in other parts of the country. The BLM should carefully study and document this damage before allowing any off road vehicle use in the RA.

Finally, we support the closure of ways in El Malpais and in the Ignazio Chavez-Chamisa area depicted on map C-21 and the road on the northern boundary of Ojito depicted on map C-16. These road and way closures would help to increase the amount of land categorized as primitive and semi-primitve non-motorized under the Recreational Opportunity Spectrum analysis.

Thank you for the opportunity to comment on the Rio Puerco Management Plan.

Sincerely,

James W. Norton
Soutwest Regional Director

Response to Comment Letter #23.

23-1 **Closing all SMA's to motorized vehicle travel would in some cases not be consistent with the management objectives of areas; for example, the Torrejon Fossil Fauna SMA will be an area of scientific study, and therefore access must be maintained. This would also be true for some of the cultural resource sites that are in SMA's. In other SMA's there are no existing roads or trails; therefore, off-road-vehicle travel would be eliminated for the present; however, a vehicle trail might be necessary at a later time for scientific research, and therefore our management objectives are still to limit the area. The off-road vehicle closures and limitations were based on the management objectives of the SMA's and BLM believes that these proposed restrictions will protect the resources.**

This RMP is intended to give management guidance for the WSA's only if they are not designated as Wilderness. The revised State-wide Wilderness EIS will analyze the impacts of designating or not designating the WSA's as Wilderness Areas. The wilderness values are protected under Wilderness interim management; therefore, closing these areas to motorized vehicle use is unnecessary at this time.

24

Albuquerque Wildlife Federation
1914-1952 GAME PROTECTIVE ASSN. / 1952-1972 ALBUQUERQUE WILDLIFE & CONSERVATION ASSN. / 1973 ALBUQUERQUE WILDLIFE FEDERATION
ORGANIZED BY SPORTSMEN IN 1914 TO PROTECT AND PERPETUATE
OUR WILDLIFE AND NATURAL RESOURCES
P. O. Box 1234
Albuquerque, New Mexico 87103

June 16, 1985

Mr. Herrick L. Hanks, Area Manager
Bureau of Land Management
Rio Puerco Resource Area
P.O. Box 6770
Albuquerque, NM 87197-6770

Dear Mr. Hanks:

The Albuquerque Wildlife Federation, as indicated at your public hearing, supports alternative B: Resource Conservation. This alternative places primary emphasis on Maintaining or improving the important environment values of the area. We would like to see the management direction changed so that the identified issues are resolved in the manner that places the highest priority on the improvement of the Rio Puerco Resource area for wildlife and watershed.

If the area is to recover from past use, we have to expect a change in some current uses. It is the Federation's feeling that this action should be taken now.

I appreciate the opportunity to participate in the Rio Puerco Resource Area Management Plan.

Sincerely,

Bob Nordstrum

Bob Nordstrum
President

No substantive comments in Letter #24.

Affiliated With The National Wildlife Federation

25

National Parks & Conservation Association
1701 Eighteenth Street, N.W.• Washington, D.C. 20009

RUSSELL D. BUTCHER
Regional Representative
SOUTHWEST & CALIFORNIA
Box 67
Cottonwood, AZ 86326
(602) 634-5758

(202) 265-2717

June 26, 1985

RE: RIO PUERCO RMP/EIS

Mr. Herrick E. Hanks
Area Manager, Rio Puerco Resource Area
Bureau of Land Management
P.O. Box 6770
Albuquerque, NM 87197

Dear Mr. Hanks:

National Parks & Conservation Association, a private nonprofit membership organization, appreciates the chance to comment upon the Draft Rio Puerco Resource Management Plan/Environmental Impact Statement of March 1985.

First, we consider this document particularly well written. You and your staff should be commended.

We are especially interested in the section dealing with Special Management Areas (SMAs). The list of 22 areas is an outstanding array of natural, pre-Columbian, and historic values that indeed deserve meaningful protective status. We hope, of course, that Cabezon Peak, Ignacio Chavez, El Malpais, and Petaca Pinta will ultimately be established by Congress as wilderness areas. The remaining 18 areas, we agree, deserve other categories of BLM-administered protection.

Especially deserving of special management, in our view,
are Torrejon Fossil Fauna, a type locality for significant
paleontological assemblages, which clearly deserves Area of
Critical Environmental Concern (ACEC) designation; San Luis
Mesa Raptor Area deserving of ACEC protection; Cañon Tapia,
with outstanding pre-Columbian rock art sites amid spectacular
canyon landscapes deserving ACEC protection; Guadalupe Ruin &
Community, an important Chacoan Outlier that clearly deserves
25-1 continued protection under the existing cultural resources management
plan (why not also worthy of ACEC designation?); Elk Springs
for both its important paleontological values and ~~as~~ significant
elk and mule deer wintering range as worthy of ACEC designation;
Tent Rocks, a short way southwest of Bandelier National Monument,
containing a spectacular array of tent-rock formations (remnants
of fumeroles where hot volcanic gases escaped) (similar to several
groups of tent rocks in Bandelier National Monument), along with

areas of badlands and small canyons--all deserving of ACEC designation with a ban on surface disturbances and a ban on motor vehicles except on existing roads (not trails, however); Ball Ranch for its rare-plant species and outstanding paleontological values deserving ACEC and Research Natural Area designation; and Pronoun Cave and several other caves valued especially
25-2 for their paleontological values and bat populations--deserving of ACEC and RNA status.

Overall, we support Alternative D (Balanced Management) for the Rio Puerco Resource Area. Regarding land tenure adjustment, in general we support the concept of exchanging private surface and subsurface interests from environmentally sensitive areas--exchanges which can tend toward practical blocking up of federal and private interests. We especially urge resolving the checkerboard pattern of ownership in El Malpais, exchanging out private surface and subsurface interests. We also hope and urge similar exchanges to expand and enhance the various Special Management Areas. Likewise, should State of New Mexico tracts be exchanged out of these areas, particularly now while the State Land Office is expressly interested in cooperating with the Bureau of Land Management.

Again, we appreciate this chance to comment, and hope that the above remarks may be helpful.

Sincerely,

Russ Butcher

Russell D. Butcher
Southwest-&-California Representative
Box 67, Cottonwood, AZ 86326

cc: T. Destry Jarvis
NPCA vice president

Responses to Comment Letter #25.

25-1 The ACEC recommendations were based on the level of mineral restrictions needed to protect an area. Development of locatable mining claims within ACEC's requires the filing of plans of operation and the preparation of environmental assessments (43 CFR 3809). However, in some cases the BLM chose to be more restrictive, and the Guadalupe site has been withdrawn from Federal mineral entry. The site is also on the National Register of Historic Places, there is an existing Cultural Resource Management Plan, and the main ruin is closed to grazing. The BLM believes that an ACEC designation is not necessary because the existing restrictions are sufficiently protective.

25-2 In the Proposed RMP/Final EIS, the Pronoun Cave Special Management Area management objectives have been changed to include both RNA and ACEC status. ACEC designation will require the filing of plans of operation and the preparation of environmental assessments before locatable mining claims can be developed (43 CFR 3809).

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Rio Puerco Livestock Assn.
Cuba, New Mexico
July 22, 1985

Mr. Rick Hanks
Bureau of Land Management
Albuquerque, New Mexico

Dear Sir:

The Board of Directors and Officers of the Rio Puerco Livestock Association wish to attest with their signatures that the ORV comments and signatures were forwarded to B.L.M. within a reasonable time after we had the meeting. The effort to get the members reactions could be repeated but it is a hard trying undertaking that possibly can be avoided by this resume'.

There were no comments favorable to O.R.V. use, and the total collected were approximately 100 singatures. Our presence at the meeting for public comment that was held in Cuba indicated our position, and the minutes of that meeting will reflect that.

Rudy Gutierrez
Rudy Gutierrez, President

Manuel F. Martinez
Manuel F. Martinez, Secretary

Aparcio Gurule
Aparcio Gurule, Member

Eugene Johnson
Eugene Johnson, Member

Sisto Sandoval
Sisto Sandoval, Member

Rey Lovato
Rey Lovato, Member

No substantive comments in Letter #26.

Approximately 100 members of the Rio Puerco Livestock Association signed a petition requesting the BLM to limit motorized vehicle use in the RPRA to existing roads and trails. This petition was apparently lost in the mail. This letter, received after the close of the formal comment period, is a summary of the position of the Association.

27

The Rio Grande Chapter of the Sierra Club

1917 Gold S.E.
Albuquerque, New Mexico 87106
June 30, 1985

Mr. Herrick E. Hanks, Area Manager
Bureau of Land Management
Rio Puerco Resource Area
3550 Pan American Freeway, N.E.
Albuquerque, New Mexico 87197-6770   HAND-DELIVERED

Dear Mr. Hanks,

On behalf of the Rio Grande Chapter of the Sierra Club and Southwest Research and Information Center, I would like to submit the following comments on the Draft Rio Puerco Resource Management Plan and Environmental Impact Statement. The comments touch on the process, scope and form of the planning document and on a range of specific, substantive planning issues. All page references in parentheses are to the draft plan, unless otherwise indicated.

In general, we endorse Alternative B of the plan, the "Resource Conservation Alternative", with certain strengthening qualifications. It is evident from the analysis contained in the Draft RMP that the No Action alternative, Alternative A, is unacceptable and does not comply with the Bureau's responsibilities to manage the lands for multiple use and sustained yield, to protect and enhance wildlife and rangeland resources and to conserve other values. Alternative D, the "Balanced Management Alternative", is less desirable but still clearly superior to Alternative C, the "Resource Production Alternative". Overall we noted an overemphasis on making lands available for mineral development, to the detriment of the surface resources.

The provision of maps within the document greatly assisted the interpretation of the information that it contained. The inventory system for recreational resources, the "Recreational Opportunity Spectrum", provided some useful insights into the condition of this resource and by implication on wildlife habitat and other values dependent on undisturbed conditions. We encourage BLM to bear in mind its discretion to expand the boundaries of categories such as primitive and semi-primitive non-motorized by means of selective road closures and rehabilitation of natural areas. The maps and figures as well of the various listed Special Management Areas were of value in interpreting the plan. Appendices summarizing other documents and methodolgies used for resource evaluation were necessary and useful.

However, on the whole the document was difficult to interpret in terms of likely effects of the alternatives on the actual resources. This reveiwer found the numerous references to previous BLM documents a great obstacle to comprehension of the decisions being made in the document. The context for the decisions in the plan is formed by previous decisions, expressed in the referenced documents. Although some of these were in part summarized, the reader was left with little knowledge of the actual management conditions and decisions being addressed. Moreover, the BLM's range of discretion to manage the resources in different ways was not always clear; the discussion below of oil and gas leasing and planning for coal development give examples of this.

Under the National Environmental Policy Act, environmental impact statements are intended to provide clear information to the public and to the decision-maker about the full range of alternatives available as well as on the conditions of the affected environment and consequences of each of the alternatives. 27-1 All alternatives must comply with applicable laws and regulations, although significant alternatives outside of the agency's immediate discretion may also be addressed [v. 40 CRF Section 1502.14]. In addition, the agency should list and briefly describe alternatives not considered.

27-2 The Draft RMP explains why a no-grazing alternative is not addressed in the document, but it does not go beyond this to suggest the existence of any other alternatives to the four presented or to explain why none are considered. Examples of such alternatives that are not addressed include an alternative to maximize non-commodity resource values, restricting the issuance of mineral leases and increasing forage allocations to wildlife, for example. Several such alternatives lie buried under the weight of continuing management guidance, much of which appears to express prior decisions in plans such as the Chaco Management Framework Plan, the Divide MFP, the Ladron MFP, the Rio Grande MFP, various grazing EISs, and documents such as the 1981 Timber Management Plan for the Albuquerque and Socorro Districts, the 1976 Technical Report and Environmental Analysis Record for Proposed Geothermal Leasing of Cabezon, San Ysidro, and Santa Ana Mesa Country, and the 1974 Northern New Mexico Oil and Gas Environmental Analysis Record. The planning decision summaries in Appendix A are helpful in giving substance to the Draft RMP's continuing management guidance, but the full significance of some of these decisions remains unclear to the reader.

An example of this is the Chaco MFP Minerals decision M-1.1 on coal lease tracts, carrying areas forward for leasing. 27-3 The Chico Wash tracts that were included in activity planning for the San Juan River Region Round I sale lie near proposed wilderness areas in the RPRA. Development of these and other tracts or other coal lands could greatly impact the Ignacio Chavez WSA and possibly other areas; serious implications for impacts from coal development on the already-damaged Rio Puerco watershed on these tracts also need to be addressed. Nevertheless, it seems that their inclusion in a lease sale is a foregone conclusion, based on the Chaco MFP. Both the Sierra Club and Southwest Research and Information Center have in past commented to the BLM, opposing leasing in these and other areas. We refer BLM to our comments on the San Juan River Regional Coal Leasing EIS as well as the 1981 Chaco MFP Update for Coal. Absent a clear determination of the sufficiency of the Chaco MFP for coal planning purposes, we recommend that the BLM reexamine its previous decisions on potential coal lands in the RPRA, subjecting these lands to full multiple resource analysis as prescribed for RMPs.

27-4 The summaries of the Records of Decision in the West and East Socorro and Rio Puerco grazing EISs need to be more informative. We are sympathetic to the BLM in its efforts to implement previous environmental analysis and planning for activities such as grazing while it conducts ongoing land use planning. But without reproducing all of the analysis contained in those documents or forcing the reader to seek them out, a better picture of the grazing management situation and implications of allotment management plans is needed. For example, what fraction of available forage is allocated to wildlife in each instance? What generally is the status of developed water supplies for livestock and wildlife use? What are the general effects on soils and watershed of present and planned grazing levels? We are concerned that forage allocations for wildlife are disproportionately small compared to those for grazing.

27-5 Similarly, the Timber Plan and the Geothermal and Oil and Gas EARs hold great potential weight for all other resource decisions, yet they are not summarized at all. Given the importance of these resource and policy decisions, more explicit statements are needed for readers to understand the results of the decisions carried forward and their implications for the management issues that are addressed in the Draft RMP. For example, how can BLM effectively plan for the maintenance of primitive areas or critical wildlife habitat, or manage watersheds to prevent erosion, if its plans and activities may be altered randomly by private oil and gas exploration efforts or geothermal development, requiring roads, wells and pipelines, and other construction? It is our feeling that comprehensive environmental analysis is needed for BLM activities such as oil and gas leasing. Oil and gas leasing represents a significant federal action under the purview of NEPA, and such analysis, site-specific to the RPRA and including the impacts of full field development, properly belongs in the Draft RMP. The absence of analysis of cumulative impacts from such development is a serious flaw in the Draft RMP.

27-6 Tiering of information is specifically provided for under the governing CEQ regulations [40 CFR Section 1502.20]; moreover, the purely pro-forma repetition of previous planning efforts at the same level of generality can be unproductive. However, the demands of comprehensive analysis and clarity in understanding the effects of aggregated planning decisions require that policies and planning decisions be explained by more than a bare reference to past documents in which they were reached. It should made clear here that we are referring to matters of policy and practice that belong to those areas of discretion open to BLM in its planning functions; we do not propose that BLM entertain reopening judicial controversies such as the Valdez et. al v. Applegate, et. al. lawsuit or statutory obligations such as interim protections for WSAs.

We disagree with BLM's determinations on suitability as applied in the Chaco MFP or the Draft San Augustine Coal Area MFP Amendment. As we have stated in our previous comments on the Chaco MFP and its amendments and on coal activity planning included in the San Juan Basin Action Plan (which we incorporate here by reference), land use planning decisions on coal should be made with the benefit of full multiple use resource analysis, as prescribed by the Federal Land Policy and Management Act of 1976 [PL 94-579, Section 202 (a) and (c)]. 27-7 This includes applying all of the four land use screens (as outlined in both the 1979 Federal Coal Program EIS and the 1985 Draft Supplemental EIS on that program). It is BLM's responsibility as surface management agency to fully apply all unsuitability criteria at the RMP stage, rather than deferring these criteria to activity planning or mine plan review. Full determinations on reclamation potential should be made at the present stage. In fact, the Department of Interior, in declining to adopt an unsuitability criterion covering reclamation potential, asserts that such a determination is to be factored into the "multiple resource trade-offs" that are part of the land use planning process [see pp. 34-36, A Review of the Unsuitability Criteria in Federal Coal Leasing, USDI, March 1985]. Accordingly we call for BLM to follow this recommendation in the preparation of this RMP.

One may well question the perceived need by BLM to carry forward any lands for additional coal leasing, in view of the evidence presented in the 1985 Supplemental EIS on the Federal Coal Program and the companion Coal Production Forecast Technical Report that additional leasing is unneeded for expanded production under all demand scenarios. Please refer to our comments and those of Dave Marcus of the Environmental Defense Fund on those documents in this regard.

27-8 We object in particular to the inclusion of coal-related decisions being carried forward from the Draft San Augustine Coal Area MFP Amendment; this is a draft document withdrawn while still out for public review and comment; presumably no record of decision was issued on this amendment, since there was no final version released. Accordingly it seems irregular to accept as binding any planning decisions proposed in that document as part of continuing guidance for a Resource Management Plan now in progress. This contradicts the clear intent of FLPMA that RMPs would supplant and take precedence over MFPs and MFP amendments. This irregularity is heightened by the lack of any reevaluation or description of the unsuitability determinations contained in the Chaco MFP and the San Augustine Coal Area MFP Amendment.

27-9 Given the lack of information in the Draft RMP alluded to above, it is unclear whether unsuitability criteria were applied properly to WSAs that had been dropped because of the presence of split estate lands. All lands under Interim Management Program protections should be dropped from any further consideration for coal leasing, as well as withdrawn from all other mineral entry or leasing. 27-10 Additionally, we are puzzled by the two separate figures given for lands excluded from futher consideration for coal leasing under the Alternatives B and D. Alternative B states that 5,720 acres of land within the area evaluated by this RMP would be carried forward for consideration for leasing, whereas 8,020 acres would be carried forward under Alternative D (pp. 2-37 and 2-42). Whence the difference of 2,300 acres? If there are valid environmental grounds for not carrying land forward for coal under Altnernative B (including unsuitability criteria), what is the rationale for adding these lands to the high potential category for leasing under Alternative D? The draft plan does not indicate the reasons for this.

The area addressed in the Rio Puerco RMP is quite extended and includes a wide variety of resouces, both renewable and nonrenewable. The proximity of the Rio Puerco Resource Area to metropolitan Albuquerque presents BLM with both serious management problems as well as unique opportunities for use of the public lands. The production of commodity resources from the RPRA is relatively limited in total value when compared to the recreational, educational and scientific values that this area possesses. This results in part from its unique natural and human history and in part from its geographical location near urban centers. The RPRA offers unique opportunities for desert recreational experiences, especially for Albuquerque residents seeking non-snow oriented outdoor winter recreation.

Quantification is difficult, but a sense of the future importance of the RPRA's present nature-oriented recreation potential may be obtained by weighing the projected growth of the Albuquerque Standard Metropolitan Statistical Area. Population is expected to exceed 800,000 people by the year 2020, a date that should be within the planning horizon of this RMP. If one may judge by the desires and attitudes of current new residents in the state, many of these people will have moved to this area seeking the quality of life in New Mexico that is rooted in a undisturbed natural setting. This fact is confirmed by the rankings in Table 3-4 (page 3-20), which clearly indicate that nature-oriented, non-motorized recreation take precedence for the public at large.

27-11 Despite the obvious significance from a planning perspective of the demographic trend mentioned above, one finds little discussion of population projections and regional urban growth in the planning document. One may note from Table 3-5 the more than 33% population increase locally and the statewide increase of over 28% during the decade between 1970 and 1980 (page 3-23). At the crude rates of Table 3.5, Bernalillo County alone will have almost three-quarters of a million people by the year 2000 and a million will live in the five county area of the RPRA. In addition, the national trend of increased primitive outdoor recreational activity remains strong, with the saturation of demand nowhere in sight; the Draft RMP should at least mention these national shifts in recreational activity as well, since they are likely to prove crucial to the management of the RPRA. For planning purposes some more sophisticated estimates of future population, use patterns and resource demands should be made. The omission of a thorough discussion of demographic pressures on the region is a serious deficiency in the plan.

27-12 In regard to the issue of recreational resource management and planning for growth in demand, this reviewer was struck by the lack of any reference to open space or comprehensive urban planning by the metropolitan governements within the RPRA. The city of Albuquerque has moved to annex land all the way to the Rio Puerco basin for future urban sprawl, and the communities of Rio Rancho, Rio Estates and other urban developments are experiencing rapid geographical expansion. These municipalities must address the issue of recreational and scenic open space within and near their boundaries.

Although the initiative for such open space and park planning must come from the local, state and tribal governments, some awareness of these planning needs by BLM is necessary. The city of Albuquerque has formulated open space goals for its immediate area; it would be appropriate for the BLM, as responsible federal land manager, to address a regional perspective for recreational planning as well, with Albuquerque specifically in mind. Consultation and coordination for effective joint planning require more than letters of notification and transmittal of copies of the Draft RMP. 27-12 (cont)

Recreational demands on public lands are growing at a non-declining rate nationally. The demand for primitive recreational experiences is one that New Mexico is uniquely positioned to fill. The economic contribution that wilderness and nature-oriented tourism can provide to New Mexico is contingent upon the degree to which the resources of wilderness and non-pristine but still natural areas is conserved. There are two main complexes of wilderness lands within the RPRA, one comprised of the El Malpais, Rimrock, Little Rimrock, Sand Canyon, Pinyon, and Petaca Pinta WSAs, and the other including the Ignacio Chavez, Empedrado, La Lena, Chamisa, Ojito and Cabezon Peak WSAs. Both of these complexes provide ready visitor opportunities to the Albuquerque area and to traffic along two of the principal interstate routes through New Mexico. We recommend that BLM seek to consolidate these areas as much as possible by selective road closures or permitted vehicle access only on existing routes, in order to capitalize upon these wilderness values.

The scenic and wilderness qualities of the WSA lands and other potential Special Management Areas (SMAs) are scarce in nature, as the ROS inventory partially indicates. Coupled with an increasing national demand for recreation in a natural setting, this argues that BLM's primary management focus should be on protection and enhancement of the natural qualities, such as wildlife habitat and wilderness attributes, and the development of non-impairing recreational use. The existence in the RPRA of only 43,034 acres of primitive lands, 4.8 percent of the planning area, and 149,142 acres, 16.7 percent, of semi-primitive non-motorized lands (according to ROS data on page 3-19) demonstrates the urgent need to conserve this resource and to expand it if at all possible. Accordingly, we recommend that BLM manage all semi-primitive, non-motorized areas as SMAs, closed to off-road vehicle use.

27-13 We note in passing that Table 2.2 (page 2-19) needs to be updated to reflect the resolution of *Sierra Club, et. al. v. Watt, et. al.*, which reinstated all lands dropped from wilderness study on the basis of split estate status and insufficient size. It has been established as a result of that decision that BLM has the responsibility and authority to manage these areas as wilderness, subject to valid existing rights, and we encourage BLM to incorporate this enhanced potential for wilderness in its planning.

The BLM is to be commended for its inclusion in Alternatives B and D of 22 proposed or existing special management areas. Appendix C of the Draft RMP proved to be helpful in understanding BLM's proposals in this regard. We strongly recommend the designation of all of these areas as SMAs, with their withdrawal from mineral entry, motorized travel and other incompatible uses. 27-14 We also recommend that the BLM consider expanding the boundaries of these areas to ensure that the resources for the protection of which they were proposed can be adequately managed. In particular, we wish to suggest the following expansions of the proposed SMAs:

1. Cabezon Peak. The BLM has proposed that 5,765 acres be made an SMA. The New Mexico BLM Wilderness Coalition has proposed that 7,984 acres be designated as wilderness. The larger boundaries are defensible in terms of the naturalness of the area and the need for manageability.

2. Petaca Pinta. The BLM has proposed that 5,363 acres be designated as an SMA, whereas the BLM Wilderness Coalition has recommended that 14,800 acres be reserved as wilderness. This area is one of the most outstanding BLM WSAs within driving distance of Albuquerque, as was recognized by BLM in its previous wilderness studies.

27-14 (cont) 3. Other BLM WSAs. We recommend that BLM designate all WSAs in the RPRA as SMAs, closed to all ORV use, wood gathering and mineral development, to protect their outstanding scenic, scientific and wildlife resources. The fact that these twelve wilderness study areas have survived the Bureau's stringent initial inventory process by itself indicates the presence of valuable wilderness qualities in these areas. When coupled with the limited amount of primitive lands available within the RPRA, as revealed by the ROS study, it becomes clear that such natural areas are a limited and fragile resource that should be maximized in BLM planning.

Although BLM states that it does not address in this Draft RMP the questions of wilderness designation contained in the statewide Wilderness Study, it would behoove BLM to formulate its management plans in harmony with the need to conserve wilderness both under the present Interim Management Plan and under long term recreational planning.] Other benefits, such as enhanced watershed protection and cultural resource conservation, may be cited in favor of this proposal. For example, BLM notes in the Draft RMP that erosion and sediment production would be increased under Alternative C (maximum resource production) over the rates expected under Alternatives B and D, partly as a result of designating fewer SMA's (No quantitative estimates of these differences in impacts are given in the Draft RMP, however).

27-15 We note that no real quantification of the mineral resource values presumably foregone by designations of SMAs has been made. A bare comparison of acres withdrawn from mineral entry or leasing does not convey an accurate notion of the resource trade-offs and in this case is misleading, since these areas have little mineral potential in comparison to the surface resource values (see Tables 4.2 and 4.3, and summary on page 4.9). We recommend that BLM provide some indication of the probable quality of mineral resources involved in such designations, rather than simple acreages, in order to better evaluate these trade-offs.

We also wish to discourage BLM from relying upon stipulations placed in leases for fluid and other minerals to protect surface resources. The legal force of "NSOs" or no-surface-occupancy stipulations is at present unclear; decisions to allow leasing within proposed SMAs could result in undesirable and unavoidable development in the future, despite the protective intent of such stipulations. We also observe that for any lease stipulations to be meaningful, monitoring and enforcement are necessary. The use of lease stipulations rather than withdrawals creates an additional burden on limited BLM staff resources, resulting in a situation where there is great potential

for evasion or circumvention of the stipulations with consequent harm to the surface resources.

27-16 In regard to the other SMAs proposed in the Draft RMP, we are unclear as to the reasons for the limited sizes of Big Bead Mesa, Azabache Station, Jones Canyon, and Pelon Watershed; we request that some analysis be provided in the final RMP document for these limitations as well as on the variances in the recommended sizes for Cabezon Peak and Petaca Pinta (see above). In general, we endorse BLM's proposed recommendations for the other SMA's as minimum acreages.] We recommend that BLM not permit mineral development in any of the SMAs, including the Tent Rocks area, a popular public recreational site. We encourage the BLM to take into account the primarily recreational uses of both BLM and surrounding Forest Service lands in such circumstances and to assure their preservation from development impacts.

We approve of BLM's serious efforts to address the question of off-road vehicle use of public lands within the RPA. At present this use is both incidental to other resource uses (such as wood gathering) and purely recreational. We strongly urge the BLM to limit the need for commodity-oriented ORV traffic by severely limiting any additional mineral leasing and sales and by avoiding the opening of new wood cutting areas such as the area between the Ignacio Chavez and Chamisa WSAs, as considered in Alternative D (page 2-39). The question of recreation-oriented ORV use poses more difficult questions for BLM

We note that according to the ROS study, some two-thirds of the existing land withing the RPRA is now roaded. The erosion and watershed deterioration resulting from this circumstance merits closer attention in evaluating proposals to open additional lands to ORV use. For example, inasmuch as the RPRA is a major contributor of sediment to the Rio Grande (pp. 3-8, 3-10), resulting in great public costs in terms of reduce reservoir storage and river channel capacity, ORV use in the RPRA as it contributes to soil loss is more than just a question of recreational preference. One could also point to the impacts of unrestricted ORV use on wildlife habitat, including riparian breeding areas for antelope and bird species, and on livestock. BLM has the obligation to take firm action to protect soil, water, range and wildlife resources as necessary, including the restriction of off-road travel.

We are also aware that BLM lands are under increasing pressure from ORV users and that a small but significant part of the expanding recreational demand resulting from Albuquerque's growth consists of ORV recreationists. In general we endorse BLM's proposals to confine ORV use to the northern, more extensively roaded area of the RPRA. We also endorse the concept of restricting ORV use to existing roads and trails. However, we urge that BLM close roads and trails within WSAs, including the El Malpais area, to all ORV use as incompatible with the purposes of these areas.

We strongly recommend that BLM conduct additional ongoing inventories of soils and watershed condition, so that damage from ORV use may be documented in terms of specific impacts and that prompt remedial actions be taken, including ORV closures, where damage is evident. The long term capability for and effectiveness of measures to rehabilitate ORV damage should be evaluated before BLM places much reliance on such measures in permitting expanded ORV use. Where impacts of ORV use are known, such as on nesting areas in arroyos, or where cultural resources may be rendered vulnerable to vandalism by increased vehicle accessibility, ORVs should be prohibited.

Since it is unlikely that ORV use can be completely precluded, we encourage BLM to designate specific ORV trail systems, located outside of sensitive areas, and to maintain these trail systems in order to accommodate public demand. BLM will need to plan for diligent monitoring and enforcement programs to ensure that recreational ORV use does not damage other resources and that ORV users remain within the designated use zones. The inherently intrusive nature of ORV recreation, with its potential to degrade other, non-motorized recreational uses, should be weighed heavily when seeking to expand ORV areas.

27-17 In regard to the issue of land ownership adjustments, we are disappointed that BLM did not find it necessary to include in the list of decisions the question of which lands should be acquired for addition to the public domain (page 1.6). There are inholdings or lands adjacent to several of the BLM WSA's within the RPRA which should be acquired to enhance the manageability and boundaries of these WSAs, including the El Malpais, Rimrock, Ojito, and Ignacio Chavez WSAs. The Draft RMP is the proper place for BLM to consider such ownership adjustments. The absence of this decision from the planning criteria seems to reflect a bias towards the disposition of public lands rather than their retention in public ownership, which is the policy specified under FLPMA. We urge BLM to reaffirm this policy in its Draft RMP.

27-18 In regard to the issue of fuelwood supply, we wish to note that the supplies of fuelwood on BLM lands will not be able to meet the potential demand and that BLM would serve the public better by managing the RPRA for its other renewable resource values, including wildlife, watershed and recreation. The standards that BLM will employ in managing its woodlands are unclear; information on sustainable yields, criteria for "essential roads", and standards for improvement (page 1-7) are not specified in the Draft RMP. We would like to point out that the creation of any additional roads in the RPRA necessarily complicates BLM's management functions by expanding the opportunities for unauthorized uses of the public lands.

This concludes our comments on the Draft Rio Puerco Resource Management Plan. Thank you for the opportunity to review this document.

Very truly yours,

Jonathan M. Teague

Jonathan M. Teague

cc: Jack Kenney, Chair, Rio Grande Chapter, Sierra Club
Wm. Paul Robinson, Research Director, Southwest Research and Information Center
Maggie Fox, Southwest Regional Representative, Sierra Club
Karin Sheldon, Sierra Club Legal Defense Fund

Responses to Comment Letter #27.

27-1 As stated in Chapter 2 of the Draft, the only alternative that was considered and dropped was the "No Grazing Alternative." There are numerous variations of each alternative which could have been analyzed; however, we believe that the alternatives presented give an adequate range of management options. Analyzing more management options would not help to define the issues for the decision maker or the public.

27-2 The purpose of the this RMP is to build on an existing management base, which is described in the Continuing Management Guidance section of Chapter 2. However, the RMP process does require analysis of alternatives which focus on changes in existing management based on issues. Agencies are required by the Council on Environmental Quality (CEQ) regulations (40 CFR 1502.1) to "focus on significant environmental issues and alternatives and reduce paperwork and the accumulation of extraneous background data." The CEQ regulations also allow for tiering of environmental information to reduce paperwork: "Agencies are encouraged to tier their Environmental Impact Statements to eliminate repetitive discussion of the same issues" (40 CFR 1502.20). Re-analyzing existing resource programs would dilute the analysis of the real issues of this RMP.

The environmental documents you referenced were prepared under full compliance with NEPA and were circulated to the public for comment. The planning documents were also available for public review.

27-3 A portion of the Chico Wash South Tract was explored through drilling, and no substantial coal reserves were found. In addition, this tract also had inadequate cultural resource inventory. Therefore, this tract has been recommended to be dropped unless additional drilling and cultural resource inventories are completed. The M-1.1 decision in the Chaco MFP (Appendix A) has been amended to reflect this change.

27-4 See the response to Comment 16-4.

In addition, the allocations of forage for wildlife habitat and grazing use, and the impacts on soils and watershed were described in these three grazing EIS's. These documents were developed with full NEPA compliance including public participation. These documents are not being reanalyzed in this RMP/EIS. Your concerns therefore are not applicable to this RMP/EIS.

The continued implementation of these three grazing EIS's (e.g., status of water supplies for livestock and wildlife use) can be tracked through the Rangeland Program Summary Updates (RPS) which are published and distributed annually. We will ensure that your group is on our RPS Update mailing list.

27-5 See the response to Comment 27-2. The Environmental Analysis Records (EAR's) that you reference were circulated to the public and had NEPA compliance. Oil and gas leasing is an on-going program which has been throughly analyzed; since BLM is not proposing any changes from its present management, no additional analysis is required in this RMP.

27-6 See the response to Comment 27-2.

27-7 The unsuitability criteria and the other three land use screens have been fully applied in this RMP. Please refer to Appendices D and E in the Draft RMP. The reclaimability of the area was considered and, at this time, the BLM believes the area can be satisfactorily reclaimed; however, the BLM will reconsider this issue on a site-specific basis during activity planning.

27-8 This RMP has not accepted any decisions from the Draft San Augustine Coal Area MFP Amendment. We assume that this comment was based on Map 2-2 on page 2-5 in the Draft RMP. This map displays the areas that were covered under old planning documents regardless of whether these documents' decisions are accepted by this RMP. The status of the San Augustine Management Framework Plan Amendment is correctly described on page 3-3 of the Draft RMP. The lands in the San Augustine Coal area will not be considered for leasing until an RMP is prepared for the Socorro Resource Area.

27-9 The area under consideration for coal leasing contains no WSA's that were eliminated from Wilderness consideration.

27-10 The difference in acreage between Alternatives B and D is the result of the different emphasis on utility corridors. Alternative B is intended to offer enhanced "protection" to the rights-of-way corridor and window which adjoin on the west the area having maximum coal development potential. Under this alternative, coal development potential would be "sacrificed" to protect the future uninhibited and unrestricted development of transmission structures, principally pipelines, within the window and corridor.

Alternative D proposes to put coal development on a more even footing with rights-of-way corridor protection. Essentially all of the area having maximum coal development potential would be considered as suitable for further consideration due to the proposal to stage construction of pipelines and transmission structures. A pipeline constructed prior to coal leasing would be afforded "protection" by requiring the coal company to bear any relocation expense. Pipeline companies proposing to construct lines after leasing would be required to relocate their pipelines if development of the coal resources dictated removal. This compromise, as outlined in Alternative D, is considered to afford adequate protection to future rights-of-way as well as the potential coal development.

27-11 The Draft Resource Management Plan acknowledges on page 3-16 and again on pages 3-22 and 3-23 that the population of the area is growing consistently and at a rapid pace.

The New Mexico Statistical Abstract gives figures projecting the five-county population to reach 785,000 by the year 2000. This is a 30.9 percent increase over the 1980 population figures shown in Table 3-5 of the Draft, or an average annual growth rate of 1.5 percent. The Abstract also indicates an in-migration contributing to the population increase at a rate of about 2.5 percent per year for the 1970's decade, while the number employed in the area has increased at about 5.7 percent per year. We are not sure how much of the in-migration has been people coming to enjoy the undisturbed natural setting or whether it is due to employment opportunities; it is most likely a combination of the two.

The important point relative to this comment is that use for dispersed recreation is poorly documented; since we have no current use figures, it is difficult to project what use might be made in the future except to indicate that this type of recreation relates closely to the 1.5 percent annual projected population increase. In any event it is not likely that recreation land use will create substantial economic or social effects.

27-12 The BLM has assisted the City of Albuquerque in acquiring park lands along the Bosque of the Rio Grande. In addition, the BLM assisted the Forest Service and the City of Albuquerque in acquiring the Elena Gallegos Grant. All public lands close to Albuquerque have already been given to the city for open space acquisition. The acquisition and disposal of tracts for open space is an on-going program discussed in the "Lands and Realty" section of the "Continuing Management Guidance" in Chapter 2 under the heading "Recreation and Public Purposes Act."

The BLM has reviewed the Albuquerque/Bernalillo County Comprehensive Plan: Plan for Major Open Space, and the Rio Puerco staff has met with the Open Space Division, City of Albuquerque.

27-13 Table 2-2 has been revised.

27-14 The purpose of establishing Special Management Areas is not to provide interim Wilderness protection for WSA's since the WSA's are adequately protected by Wilderness interim management protection. The RMP must provide non-Wilderness management guidance for all WSA's should these areas not be designated as Wilderness by Congress. The analysis of designating and managing the WSA's as Wilderness is fully covered in BLM's State-wide Wilderness EIS.

The size of each SMA is based on the area needed to protect the resource values for which the SMA was proposed. Cabezon Peak was proposed as an SMA to protect the semi-primitive non-motorized recreational experience and cultural resource values. The boundary of this SMA corresponds to this Recreation Opportunity Spectrum category (see Appendix I in the Draft). The Petaca Pinta boundary also corresponds to the semi-primitive non-motorized ROS category. The sizes of the Big Bead Mesa, Azabache Station, and Jones Canyon SMA's were chosen to protect high value and/or high density cultural resources. The primary communities or ruins and associated outlying sites are completely encompassed and well-protected by the existing boundaries of these SMA's. The riparian habitat in Jones Canyon is also completely encompassed by the existing SMA boundary. The Pelon Watershed SMA boundary covers 858 acres while the actual watershed is only 436 acres; the boundaries of this SMA are much larger than the watershed because the boundaries were based on legal subdivisions.

27-15 See the response to Comment 39-10.

27-16 See the response to Comment 27-14.

27-17 The SMA objectives specifically recommend acquisition of private lands in the Rimrock, Ojito, and Ignacio Chavez WSA's, and the acquisition of the mineral estate in El Malpais and Petaca Pinta. Under the Preferred Alternative (page 2-42 in the Draft) the document states the SMA acreage "includes private and State trust land that is being proposed...for acquisition or proposed for management as part of...a cooperative management agreement with the owner." Furthermore the land ownership adjustment section states (page 2-45 in the Draft): "Exchange of these public lands [tracts identified for disposal] for State trust and private lands identified for acquisition as planned actions in SMA's or to benefit other resource management programs would be considered the preferred method of land ownership adjustment."

Retention of public lands in Federal ownership is the standard specified by the Federal Land Policy and Management Act (FLPMA). Therefore this is an existing program requirement that does not need additional treatment in this RMP/EIS; however, disposal of Federal lands, while authorized by FLPMA is a change from the existing land program and does require treatment as an issue.

27-18 The fuelwood supply on the public domain lands is not great enough to meet the public demand for firewood. However, if all Federal agencies, State agencies, and participating private landowners provide opportunities for fuelwood gathering designed to meet long range goals, the overall resource would not be affected to any great extent.

Management of the woodlands for whatever purpose, is beneficial both to wildlife and to recreation. An overstory of mature woodland actually intercepts a greater portion of snowfall and as it melts very little moisture reaches the forest floor but is transpired back into the atmosphere. The forest floor, devoid of any ground vegetation has very little beneficial use as a watershed or to wildlife. Sheet erosion occurs and the soil seals itself and most of the rainfall drains off the area very quickly. Very little moisture soaks into the ground to be retained for plant use. Under proper management, the forest canopy can be opened up to encourage brush and grasses to become established to provide a variety of plants for wildlife use watershed protection.

Active management of pinyon-juniper woodlands is a new concept that is being addressed not only by the BLM but by all Federal and State agencies, as well as by private individuals. Information is being gathered through cooperative inventory programs. Once this information is available and with adequate mapping and aerial photographs to coordinate initial efforts, a logical program can be devised. Until reliable data are obtained with intensive field check, our goals will remain general in nature. Sustained yield can be calculated given the number of years and volume per acre to be cut, with a given rotation period. Once site-specific information is analyzed, the BLM can decide which road or access is essential and which road or roads can be closed. Management decisions require reliable data; we do not have such data at this time.

28

NEW MEXICO NATURAL HISTORY INSTITUTE
A Nonprofit Corporation
St. John's College Campus
Santa Fe, New Mexico 87501

23 June 1985

Herrick E. Hanks , Area Manager
Rio Puerco Resource Area
Bureau of Land Management
Post Office Box 6770
Albuquerque, New Mexico 87197

Comments on Draft RMP

Dear Mr. Hanks:

In this Institute's eight years of reviewing federal resource management plans we have not found a major document with more to praise and less to blame than the Rio Puerco Draft RMP. For the most part both the document and the plans themselves seem good. Particularly to be praised are the perceptive list of special management areas and the definite stand on acquisition of non-public lands in most of those areas.

We think, however, that the off-road-vehicle policy described for Alternative B (p. 4-23) should be the recommended alternative. With regard to some areas your recommended ORV policy is even a step backward toward greater environmental damage: the 1977 Ladron MFP, for instance, restricts vehicles to existing, mapped trails, whereas your present proposal is to open most of the Ladron Planning Unit to unrestricted off-road travel. Soil and watershed protection are the Bureau's prime responsibility; without soil most other uses of the land fail. This responsibility is particularly vital in the abused basins of northern New Mexico. The Bureau has a history of weak compromise with ranchers that has contributed to the abuse. Political compromise, this time with recreationists, should not continue to rule your decisions, as would be true of Alternative D's ORV policy.

28-1 The best feature of the mostly dubious White Sands Resource Area Draft Resource Management Plan (1985) is its proposal of 40-acre exclosures for rangeland monitoring. Likewise a good feature of the 1983 Divide MFP was its 20-acre range exclosures. We think that such plans should be generalized and standardized for all resource areas in the state. Even though more difficult to create, 40-acre plots seem preferable, partly because of edge effects caused by rodents in smaller areas: on depauperate rangeland rodents concentrate in areas protected from trampling, but this effect is minimized in larger plots.

This Institute's focus is on natural areas that preserve unique or representative features. The rest of this letter comments on special management areas relevant to that interest, including #23-#24 proposed here.

28-2 Area 1, Torrejon Fossil ACEC. In this map (p. C-3) and others like it the ORV closure is unclear. You state that vehicles will be limited to existing roads and trails, but your rather detailed map (and likewise Map E) show no roads or trails in the proposed ACEC. Therefore this should be one of the areas that is simply "closed to off-road vehicles," lest motorbikers follow stock or game trails and claim legality. ...Protection should include withdrawal from mineral entry.

28-3 Area 4, Canon Jarido. This appears to be a fine natural and historical area. We recommend exclusion of grazing to protect canyon-bottom vegetation and to enhance recreation.

28-4 Area 5, Jones Canyon. Comments as for Areas 1 and 4.

28-5 Area 7, San Luis Mesa ACEC. We support this proposal. We add that attempt should be made to trade for the two included state sections and the one or two private "40's." (Maps A and C-7 disagree about ownership in T17N R3W Sec. 34.) We also suggest trading for the state's T17N R2W Sec. 16, and its inclusion in the ACEC.

Area 9, Cabezon Peak WSA. We support this proposal until the area is designated as wilderness.

28-6 Area 10, Ignacio Chaves WSA. We advocate more extensive trail closures to protect wildlife habitat. We do not understand that the proposed fuelwood cutting is necessary nor how it is compatible with other goals.

28-7 Area 13, Guadalupe Ruin. The map (p. C-27) and therefore the ORV regulations are confusing. If there is only one road or trail through the 487-acre area and vehicles will be restricted to existing roads and trails, how does it come about that only 40 acres are closed to vehicles? Aren't 485 acres closed? ORV regulations will be difficult to enforce if they are clear, impossible if not.

28-8 Area 14, Elk Springs ACEC and RNA. We wonder whether the vicinity of the proposed RNA has natural vegetation, and if so whether a larger, dual-purpose RNA, with grazing excluded, could be designed. Compare comment on Area 23, below.

28-9 Area 15, Tent Rocks ACEC. We suggest a one-section RNA here for study and protection of a sample of manzanita chaparral. Trading for at least the state section included in the ACEC should be listed as a goal.

28-10 Area 16, Ojito WSA. We strongly support all possible protective measures for this area prior to wilderness designation. Trading for included non-public lands, especially T15N R1W Sec. 16, should be listed among planned actions.

28-11 Area 17, Ball Range RNA. Plans for this research natural area should explicitly include exclusion of livestock.

28-12 Area 18, Pronoun Cave RNA. We suggest boundary adjustments or trail closure such that no road or trail lies within the RNA, and the area may be declared closed. Vehicle ways in research natural areas should be avoided.

Area 21, El Malpais WSA. This area, a showpiece for both difficulties and successful efforts in Bureau planning, will make one of our best wilderness areas. We endorse the strictest possible protective measures with continued emphasis on land and mineral-rights acquisition.

Area 22, Petaca Pinta WSA. Emphasis should be on vehicular closure and acquisition of included non-public lands. Should wilderness designation fail we would seek RNA status for parts of the area, with natural-appearing grasslands and oak shrubland.

28-13 Area 23, Ventana Mesa RNA, proposed here. T19N R1-2W. Relatively pristine examples of Colorado Plateau vegetation should be preserved for study near that region's eastern limit. It seems possible that Ventana Mesa could provide such a research natural area if the nearby Elk Springs ACEC (#14 above) cannot.

28-14 Area 24, Playa Natural Area, proposed here. The Bureau manages a 5120-acre area of playa and grassland in T3N R13E (Torrance County). Under Alternative C (Table 2-5, p. 2-38) this tract would be studied for possible disposal. (Due to a wrong reference on p. 2-45 it is not clear what Alternative D proposes.) Although we have no objection to disposal of other Torrance County BLM lands (giving Cibola National Forest first crack at adjacent lands, and Gran Quivara National Monument a chance at those in the salt flats

28-14 (cont) northeast of Willard) we think that this tract west of Duran Mesa should be studied closely. This was Roadless Area 1-062. It was properly dropped from wilderness inventory in 1979 because it does not offer outstanding wilderness experience, but otherwise it was mis-described at that time. It is not "flat," but has banks of fine sand that are 15 or 20 feet high, riddled with swallow, rodent, and reptile burrows. Shorebirds and waterfowl use the playa, which has usually contained water in recent years. Antelope use the blue grama grasslands, which are in fairly good condition. Saltgrass and chenopods rim the playa; there is little saltcedar (which could still be eliminated easily). We recommend that the state's Section 16, which is almost barren, be acquired by trade of nearby scattered tracts. If it is not practical to retain this land under Bureau management it should be offered to the Nature Conservancy, the University of New Mexico, or some other organization for preservation and research.

Again we congratulate you on a plan well made.

Sincerely,

Roger S. Peterson
Secretary

Responses to Comment Letter #28.

28-1 The need for grazing exclosures for monitoring would be considered when Allotment Management Plans are developed after this RMP is approved.

28-2 Torrejon Fossil ACEC. This area will be managed for scientific research, and therefore vehicle access to the area may be necessary. Under the "limited" status the BLM may authorize a vehicle trail into the area to assist scientific research or other management objectives. The "limited" ORV status is consistent with the management objectives of the area.

28-3 Canon Jarido. The BLM believes that cattle grazing in Canon Jarido is consistent with the management objectives of the area. The wildlife habitat and scenic values can be maintained without the elimination of livestock grazing.

28-4 Jones Canyon. See the responses to Comments 28-2 and 28-3.

28-5 San Luis Mesa. The Proposed Plan does identify for acquisition all State and private lands within SMA's. See the SMA discussions in Chapter 2.

28-6 Ignacio Chavez. Managing pinyon-juniper woodlands for sustained yield is relatively new for the BLM as well as for most agencies. Standards have not been developed for management of this species. Very little information is available about silvicultural management of pinyon-juniper woodlands. An effort is underway at this time to inventory this resource on a large scale. The results of this inventory will not be forthcoming until 1987. It is expected that this information will provide us with a data base for long-range management.

However, in the meantime, we are concentrating our harvest efforts on the "dead-and-down" material that is still available. The next priority is green tree cutting of individual, overmature trees within the stands--trees that would not survive much longer anyway. Periodic adjustments can be recommended and, once the results of the inventory data are available, more specific management plans can be prepared.

Managed fuelwood cutting actually improves the habitat for most wildlife species, especially deer and elk. By opening up the woodland canopy, sunlight can again reach the forest floor and stimulate the growth of grass, forbs, and brush which are the preferred food of most animals. Fuelwood cutting is a tool we use to replace fire as a natural agent to continually improve and perpetuate the woodland stands.

28-7 Guadalupe Ruin. The 40 acre area is presently closed to protect the main ruin, and this portion of the SMA has been partially excavated and stabilized. The remaining area, which includes outlying sites, has not been excavated or studied in detail. Authorization of new vehicle access routes may be necessary to study these outlying sites; therefore, this area is limited to existing roads and trails.

28-8 Elk Springs. The Elk Springs area contains predominantly natural vegetation. There are, however, areas where pinyon-juniper have been chained and areas that have been plowed and reseeded within the SMA.

SMA's are areas where activity plans will be developed to identify and provide additional management attention. We recognize that Colorado Plateau vegetation exists in this area, but sufficient resource information is not currently available that would warrant activity plan development at this time. Even so, the exclusion of livestock grazing seems to be a rather extreme measure to propose. In addition, changes in livestock grazing management have been and will continue to be implemented that should ensure the perpetuation of this vegetative community.

Therefore, the Elk Springs SMA will not be enlarged nor will the proposed Ventana SMA be identified at this time. This does not, however, preclude the possibility of expanding the Elk Springs SMA or developing the Ventana SMA in the future.

28-9 Tent Rocks ACEC. The ACEC designation can encompass study of the area for protection of a sample manzanita chaparral. See the response to Comment 28-5.

28-10 Ojito. See the response to Comment 28-5.

28-11 Ball Ranch. The Resource Area specialist responsible for Threatened and Endangered Species and specialists from the New Mexico State Heritage Program and the Nature Conservancy believe that there is no reason to exclude livestock grazing from this area at this time. Therefore, livestock grazing will be allowed to continue in this SMA. The activity plan developed for this SMA will provide for monitoring of livestock grazing use in this area.

28-12 Pronoun Cave RNA. See the response to Comment 28-2.

28-13 Ventana Mesa. See the response to Comment 28-8.

28-14 Playa Natural Area. Sufficient resource data are not currently available to warrant SMA consideration for this area. This RMP does, however, allow for additional SMA identification in the future as more resource data are made available and management needs are better understood.

The same lands are considered for disposal in Alternatives B, C, and D. The preferred disposal method, however, does vary among the alternatives. For Alternative D (the Proposed Plan), the preferred disposal method is exchange of the identified public lands for private and State lands identified for acquisition as planned actions in SMA's or to benefit other resource management programs.

The lands considered in the land ownership adjustment issue of the Proposed Plan are identified for further study for disposal or as potentially suitable for disposal. Before any of these identified lands can be disposed of, additional environmental study will be conducted to ensure that the criteria for the land ownership adjustment issue on pages 1-6 and 1-7 of the Draft RMP/EIS are satisfied. These criteria will be applied for the lands you identified west of Duran, New Mexico prior to any decision on their disposition. One of these criteria states that "valuable wildlife habitat on public land which is otherwise suitable for disposal will be considered for exchange only with State or local agencies or non-profit private organizations with wildlife management responsibilities."

29

(Typed for Reproduction Purpose)

June 29, 1985

Herrick E. Hanks, Area Manager
BLM, Rio Puerco RA
Box 6770
Albuquerque, NM 87197-6770

Dear Mr. Hanks,

This letter is to comment on and offer suggestions on the "draft" Rio Puerco RMP and EIS which are as follows:

1. The plan appears to have no alternatives which consider:

29-1 a. possible assertion of Indian claim and litigation in light of previous precedent setting court decisions which could nullify any plans for particular lands.

29-2 b. jurisdicitional conflicts, whereby Indians could prevent access to much of the public domain in the area. This could forseeably happen by road closure on Indian Trust land if some action is not taken to assure access. Should this happen, BLM's management capability would be hampered and the public's right to use the public lands for whatever purpose would be severely restricted. BLM, as an alternative should advocate corrective legislation to make all Indian trust lands subject to Federal, State, and Local Governmental Power of eminent domain to assure access when needed.

29-3 c. failure of the Secretary or the Congress to seriously consider this planning process or to recognize or abide by the provisions of the Federal Land Policy and Management Act of 1976 when it involves Indian land requests. I wish to point out that direct transfers into Indian trust status may be in direct conflict with FLPMA provisions Sec. 102(a) (1), (5), (8), (9), and (13). It appears that the Secretary and/or Congress have consistently ignored these provisions and the intent of FLPMA. I believe it should be the BLM's role to advocate the public's interest in these matters. The Indians' interest are already more than adequately represented.

29-4 d. the effect on State and local governments and the local economy in all types of actions. There appears to be little consideration given to the effects of closure by withdrawal or possible transfer of public lands to private or special interests including Indian tribes. Any lands advocated for transfer to Indian tribes should be examined thoroughly in light of the intent of the law establishing the Indian Claims Commission and the the provisions of FLPMA.

2. A few questionable things I find in the plan without thorough study are:

29-5 a. location and need of a motorcycle trails area on the San Ysidro Grant. It is doubtful that 4 1/2 sections are needed for such a purpose as shown on Map 2-8. A more isolated less critical area should be found where use will not be a detriment to the population and cause social conficts.

29-6 b. size and location of "Competitive Dune Buggy Events" the area shown on the map on pg. 2-36 is much too extensive. Two sections should be more than adequate. I would like to see it in a different area where potential for erosion is not so critical.

c. Please be aware that there are pending water rights lawsuits involving the Federal Government in behalf of Indian tribes and private landowners in the Bluewater, San Jose, and Jemez drainages. Hydrographic surveys are being conducted and planning decisions in these areas should consider the outcome (see pg. 2-7).

There are other comments I could make, including the impending agency jurisdiction change, however, the above, I feel, are more important.

Sincerely,

/s/James L. Mitchell
Totally Equal Americans
Canyon Rt. Box 18A.
Jemez Pueblo, NM 87024

Responses to Comment Letter #29.

29-1 There are numerous aboriginal land claims within the RPRA. However, the Bureau has continued to issue rights-of-way, administer grazing leases, etc. on the lands claimed in spite of Indian protests. The Indians have shown an inclination to litigate their interests only when the claimed lands are identified for sale or exchange. Such lands will be managed under this Plan as long as they are under BLM administration.

A section has been added in the "Continuing Management Guidance" section of Chapter 2 to identify the current Indian land claims.

29-2 On page 2-23, the Draft RMP indicates that a number of access needs were identified in the 1978 Rio Puerco Grazing ES. Without having more specific information regarding the writer's particular areas of concern, the access needs may already be addressed in the ES. The writer is encouraged to notify the Bureau of specific access concerns, so they can be addressed in future activity plans and prioritized for acquisition.

Any time that public lands are transferred to other Federal agencies, access across the transferred lands to adjacent public lands should be reserved in the transfer document. This statement has been added to the "Public Land Withdrawals" section of Chapter 2.

With regard to advocating corrective legislation, the Bureau feels that it is more appropriate for utility companies and other public land interest groups (such as Totally Equal Americans) to seek legislation to gain the power of eminent domain on Indian trust lands.

29-3 The Bureau has very little influence over Congress and how it chooses to interpret Federal laws. The BLM is usually contacted for our recommendations on direct transfers, and we use those opportunities to comment on the public interests that would be affected by such transfers.

29-4 All formal withdrawals to the BIA are published in the Federal Register and in a newspaper of general circulation in the vicinity of the lands involved. If enough opposition is expressed to a withdrawal proposal, a public meeting can also be held. These procedures, outlined in 43 CFR 2310.3-1, should provide the public, State, and local governments with ample opportunity to influence land withdrawal decisions.

29-5 This area has been used as a trials event area in the past. The trials bike is a low geared bike that is used for climbing solid rock slopes; it is not used for speed. Since the trials event area is an area of nearly solid rock outcrop, it is difficult or impossible to find the location of the previous competitive events. The trials events are of very limited popularity, in comparison to "trail bikes," because the trial bikes are slower, and very specialized.

The trials bike event area has some of the best terrain in New Mexico for this type of event. The BLM does not believe the area will be heavily impacted because it is mostly solid rock. The BLM believes that because so few riders will use the area, social conflicts will not occur.

29-6 The proposed dune buggy events area was field checked by BLM and NM Off-Road Racing Association representatives. Due to access problems and location of private lands, the competitive area has been reduced to about five or six sections in the extreme northwest portion of the proposed competitive event area (see Map 2-9). This area is not an open play area and the competitive events will be on existing roads and trails; therefore, the potential for erosion would not be critical. However, if a problem with erosion were to develop, the competitive route would be modified for future competitive events, and the erosion hazard mitigated.

30

GeoProducts

June 27, 1985

Herrick E. Hanks
Area Manager
Bureau of Land Management
3550 Pan American Freeway, N.E.
Box 6770
Albuquerque, NM 87197-6770

Dear Mr. Hanks:

We have reviewed the BLM's Rio Puerco Resource Management Plan and would like to offer some comments on the management alternatives proposed therein.

Our Company is presently considering the development of a biomass conversion project in the general area of Sandoval and Rio Arriba Counties. Our feedstock would consist of slash material from commercial logging operations, dead and down trees, and thinning of precommercial stock and pinyon/juniper intrusions into Ponderosa stands.

We encourage your adoption of management alternatives in the Rio Puerco Planning Area that would encourage these types of intensive forest management practices and sustain the yields. Such practices have been shown to increase forest growth and yields, decrease fire danger, and enhance wildlife habitat. It would appear that these objectives would be best served by your adoption of management alternatives D or C, in that preferred priority.

We appreciate the opportunity to comment on this resource management plan.

Yours very truly,

K. L. Boren
Kenneth L. Boren

WDG:KLB:pm

GEOPRODUCTS CORPORATION, 1330 BROADWAY, OAKLAND, CALIFORNIA 94612 (415) 893-8365

No substantive comments in Letter #30.

31

Chevron
Chevron U.S.A. Inc.
700 South Colorado Blvd., P. O. Box 599, Denver, CO 80201

Richard T. Hughes
Staff Analyst
Legislative and Regulatory Affairs

June 21, 1985

Rio Puerco Draft RMP/EIS

Mr. Herrick E. Hanks, Area Manager
Rio Puerco Resource Area
Bureau of Land Management
3550 Pan American Freeway, NE
Albuquerque, New Mexico 87197-6770

Dear Mr. Hanks:

Thank you for the opportunity to review and comment on the captioned document. As an oil and gas operator, Chevron is primarily interested in the Plan's treatment of oil and gas resources. We believe the approach to oil and gas issues used in the Plan is adequate. However, since we are not currently active in the Rio Puerco RA we cannot judge the propriety of decisions made under the Plan. Therefore, we reserve the right to challenge decisions made in the plan should they adversely affect future operations we may conduct in the area.

Sincerely,

Richard T. Hughes

RTH:kk

No substantive comments in Letter #31.

Central Region – Exploration, Land and Production

32

PNM PUBLIC SERVICE COMPANY OF NEW MEXICO
ALVARADO SQUARE ALBUQUERQUE, NEW MEXICO 87158

June 3, 1985

Mr. Herrick E. Hanks
Area Manager
Rio Puerco Resource Area
Bureau of Land Management
Post Office Box 6770
Albuquerque, NM 87197-6770

Dear Mr. Hanks:

Subject: Comments on the
Rio Puerco Resource
Management Plan (RMP)
and Environmental
Impact Statement (EIS)

Public Service Company of New Mexico (PNM) appreciates the opportunity to provide input and to review the Rio Puerco RMP/EIS and offers the following comments:

Preferred Alternative

PNM supports the preferred alternative, which allows for a combination of various uses within the resource area.

Right-of-Way Corridors

PNM agrees with the RMP's identification of rights-of-way windows and corridors near the Ojito SMA which will allow for future transmission line placement.

32-1 On Pocket Map B, it is recommended that existing transmission and subtransmission facilities be identified as lines that could be potentially upgraded and/or double-circuited which, in some cases, may require additional right-of-way. A facility map of the Rio Puerco Resource Area is enclosed. Also on Map B, the PGT 115 kV line north from Algodones La Jara is indicated as part of NMGS but should not be.

Land Ownership Adjustments

32-2 PNM would like to express an interest in acquiring the BLM parcel of land that our BA Station is located on (T 13 N, R 4 E, Section 14) either through exchange or purchase. It was not identified in the
32-2 (cont) 58,000 acres suitable for disposal (Table 2-5), although it was initially targeted for disposal.

Thank you for extending PNM the opportunity to provide input to your plan. The Rio Puerco Resource Area has many uses and demands placed on it. It is through the kind of long-range planning demonstrated in the Rio Puerco RMP that land uses can be compatible. If you have any questions regarding our comments, please contact Judy Novotny Suiter at 848-2023.

Sincerely yours,

Ed Kist
E. D. Kist, Manager
System & Environmental Planning

JNS:slm
Enclosure

cc: Ms. L. C. Chisholm
Mr. R. P. Maxon
Mr. E. Padilla
Mr. L. D. Sullivan
Rio Puerco Resource
Management Plan File

Responses to Comment Letter #32.

32-1 The RMP would allow upgrading and/or double-circuiting of existing lines. Such changes would be reviewed as individual right-of-way applications, and are considered to be part of the existing right-of-way program in the RPRA. The right-of-way program is discussed under the "Continuing Management Guidance" section of Chapter 2.

Pocket Map B has been revised and reprinted to include existing transmission lines, including 6 inch diameter and larger gas lines. The north-south portion of Corridor #2 was erroneously identified as part of the NM Generating Station proposal. This portion of the corridor is actually an existing 115 kV line. This error has been corrected on the revised map.

32-2 Land ownership status in the vicinity of Section 14, T. 13 N., R. 4 E., NMPM is clouded and uncertain at this time. That area of public land was considered in 1982 for inclusion in the Elena Gallegos land exchange involving the Albuquerque Academy, the City of Albuquerque, and the U.S. Forest Service. However, San Felipe Pueblo placed an aboriginal claim on the land. BLM's legal counsel advised us that Congress is the proper authority for resolving such matters. Until this land claim is resolved, the BLM feels that it would not be proper to identify that area as suitable for disposal.

33

Santa Fe Pacific Railroad Company

A SANTA FE INDUSTRIES COMPANY
P.O. Box 3588
Albuquerque, New Mexico 87190
(505) 262-2211

April 9, 1985

Mr. Herrick E. Hanks, Area Manager
U. S. Bureau of Land Management
Rio Puerco Resource Area
P. O. Box 6770
Albuquerque, NM 87197-6770

Dear Mr. Hanks:

On April 8, 1983 and November 22, 1983 Santa Fe Pacific Railroad Company responded to BLM's requests for scoping comments as BLM prepared this Draft Rio Puerco Resource Management Plan and Environmental Impact Statement. In these responses, copies of which are attached, Santa Fe Pacific pointed out that it is the owner of about 651,000 acres of reserved mineral estates in the Rio Puerco Resource area. However, after a careful review of each of the 320 pages of this document, I found not one reference to Santa Fe Pacific's substantial presence in these lands. Because of the significant effect the presence of these reserved mineral estates will have on BLM's right-of-way, oil and gas, coal, and recreation programs, this Resource Management Plan and EIS will remain deficient until Santa Fe Pacific's reserved mineral estates are adequately addressed.

33-1

It is obvious that BLM plans to designate a number of areas for special management, with attendent restrictions on access and development. Please bear in mind that, while Santa Fe Pacific supports BLM's attempts to manage the public lands for multiple use, Santa Fe Pacific's vested rights in its mineral estates must be recognized and afforded adequate protection. Any attempts by BLM to restrict access and development of these mineral estates through vehicle closures, designation of ACEC's, or other restrictive management practices will not be tolerated.

Very truly yours,

G. G. Byers
Director-Public Affairs

GGB:gem
Enclosures

Response to Comment Letter #33.

33-1 The BLM and the staff of the Rio Puerco Resource Area are acutely aware of the problems associated with split-estate and checkerboard ownership and the difficulties inherent in managing scattered and isolated tracts of land. Through years of land management experience, the BLM has acquired an appreciation of the concerns expressed by the Santa Fe Pacific Railroad Company. We also recognize that each adjacent surface and sub-surface landowner has valid existing rights and interests which must be considered by the BLM in any planning decision. These valid existing rights are covered in the "Continuing Management Guidance" section of Chapter 2.

34

Area Manager
BLM, Rio Puerco RA
P.O.Box 6770
Albuquerque, NM 87197-6770

21.06.85.

Comments pertaining to the Draft Rio Puerco RMP/EIS.

I support Alternative "C"

Rationale: Alternative C involves less road closures than your Preferred Alternative D. It leaves more public land in the "open" category. The RPRA is a major source of high quality recreational ORV experiences as you correctly state on p. 1-4. ORV recreational land use is on the increase while wilderness type recreation is declining.
Most recreational use by far is a day use activity from a motorized access point. Closing roads hinders the most popular recreation activity.

I am pleased that you address in your Alternative D to the establishment of areas for specific types of ORV uses. By doing so you recognize the full recreational spectrum. In designating ORV trails and routes these should be laid out so that these offer both a challenge and also scenery to the trailbiker and 4x4 recreationist. A graded road is not an ORV road, it, serves as an access road only.

34-1 I question your statement on page C-45 :All Motorized use within boundary limited to exsisting roads and trails". A more truthful statement would have been : All motorized use within boundary limited to designated roads and trails, since I found all existing roads, ways and trails having padlocked gates and such a high barbed wire fence, erected without foot ladders, that access even on foot has become difficult to impossible to some. This along many miles where NM117 borders the EL Malpais. This is a questionalble recreation resource management practice. The road below the rimrock viewpoint should have been left open, it could afforded an enjoyable loop road along the edge of the lavaflow in a semiprimitive motorized setting for the people traveling along the NM117. Hopefully this SMA will be managed in the future for better access from NM 117.

Lands not having legal access is of no value to public and should be disposed or exchanged if it is not feasible to obtain easements for legal public access.

Sincerely,

Harry Melts
Harry Melts
Box 64
Porthill, ID 83853

Response to Comment Letter #34.

34-1 The fencing along NM-117 was done during the paving of the route, following agreement between the NM State Highway Department and BLM's Socorro Resource Area Office which administered the El Malpais region at that time. Additional access through this fence will be considered when the specific site plan for El Malpais SMA is prepared. Many of the locked gates referred to in this comment are on private roads.

35

(Typed for Reproduction Purpose)

Jim Cole, D.V.M.
4021 Isleta S.W.
Albuquerque, N.M. 87105
Telephone 873-2590

5/22/85

Dear Mr. Hanks,

I would like the Rio Puerco Resource area left in the open status.

My son and I participated in the "Oh My God 100" last Sunday and had a most enjoyable day along with our family and the others present. I am aware of the damage irresponsible people can do to the environment. I believe we did minimal damage to the area and I know that a lot of young people and their families had a memorable day. I feel that responsible off-road use of BLM land is consistent with your goals of multiple-use of the land and its preservation.

I will appreciate your consideration of off-road users of BLM land as responsible and cognizant of potential environmental impact. Please remember these youngsters put alot of energy into training for these races - energy that if not used constructively can be destructive.

Sincerely,

/s/Jim Cole, DVM

No substantive comments in Letter #35.

36

(Typed for Reproduction Purpose)

Mr. Rick Hanks
Bureau of Land Mgt.

5-14-85

Dear Sir,

As an ORV enthusiast I strongly protest the March 1985 Resources Management Study. Any alternative that does not leave public land completely opeu to ORV use is unacceptable to me.

My entire family enjoys riding motorcycles and public land is the only place available when we go riding on Sundays and see maybe only 1 or 2 other ORV's, this tells me the pressures from ORV usage are not nearly great enough to warrant closure to limited status. I believe that you are over-reacting to a perceived problem that does not exist and without considering ORV users and their needs. For example, where in the RMP is a specific plan to set aside
36-1 land for our use if all other is restricted?

Please review your plan for our needs as we also pay taxes and represent a segment of the user public.

Thank you,

/s/Dwight Louis, Jr.

Response to Comment Letter #36.

36-1 The RMP designates the overwhelming majority of the existing roads and trails in the RPRA (over 1500 miles) as open to ORV travel. These routes vary from paved and graded roads to primitive roads and trails, with the majority of the mileage in the primitive and trail categories. This mixture provides a diversity of challenges to the ORV recreational user, and will accommodate a variety of skill levels.

The Draft RMP also has proposed an ORV recreation trail system approximately 124 miles in length (see Pocket Map E in the Draft). This has been designed to provide both a day experience as well as an overnight experience. Other factors which influenced its location were providing (1) a variety of topography, (2) a variety of route conditions to challenge different skill levels, and (3) access to trading posts for recreational information and supplies. Implementation of this trail would include installation of signs, trash receptacles, and other conveniences for the recreation user.

The Proposed RMP/Final EIS proposes to expand this trail system. The location and design of this system will be determined in conjunction with the ORV recreation community.

The RMP also proposes special use areas for trial bikes and dune buggies.

Competitive events will continue to be handled on a permit basis. The entire Resource Area is open for consideration. Any limitations would be determined through the environmental analysis process, as in the past.

37

(Typed for Reproduction Purpose)

Rick E. Hanks
Bureau of Land Management
Rio Puerco Resource Area
3550 Pan American Freeway NE
P.O. Box 6770
Albuquerque, New Mexico 87197

Dear Sir,

I urge you NOT to close or limit areas of Off Road vehicle use in the Rio Puerco Resource Area of the Bureau of Land Management.

I believe that ORV recreation on BLM land represents a substantial public use that must be safeguarded along with use by ranchers, horsemen, hikers, hunters, and others.

I do NOT believe closing of BLM land to ORV use will protect land values, minimize conflicts of use, safeguard or benefit the majority of BLM land users.

Nine copies of this letter were received from the Vadito-Taos area.

No substantive comments in Letter #37.

38

June 27, 1985

Mr. Herrick E. Hanks, Area Manager
Bureau of Land Management
Rio Puerco Resource Area
P.O. Box 6770
Albuquerque, New Mexico 87107

Re: 1610(017)

Dear Mr. Hanks:

Earlier this year, your office presented the ranchers in the Rio Puerco Resource Area with a draft of the Rio Puerco Resource Management Plan and Environmental Impact Statement. I have reviewed the draft and will now address the concerns I have with the plan. I anticipate your support in considering these concerns in the planning process.

The resource Management Plan consists of four alternatives. At this time, neither alternative A or B can be accepted. Neither one of these alternatives address the environment or the needs of the rancher. For years the rancher has struggled to maintain the stock level, on the edge of disaster. Long range plans are needed in order to ensure that range lands be productive year after year.

Alternatives C and D in the Resource Management Plan are acceptable, with some reservations. Both of these plans consider the environment and the rancher. There is a middle ground that is acceptlable. However, reservations to these alternatives are made for the following reasons.

The alternative for the "off the Road Vehicle use" located in Township 21 Range 3W cannot be accepted. Private lands should not be used by the BLM for ORV roads. This is a great concern because as the plan is written, it will occur on our private land!

38-1 The BLM never asked permission to make these ORV roads through the private land. I know of no documentation that indicates these roads were made after checking to see if the land was public or private. These lands need to be kept as fertile as possible, with little disturbances, since this is a means of survival. This does not compare to those out for recreational reasons. Since ORV use can be harmful to the delicate areas of the Rio Puerco, this alternative cannot be accepted.

Page 2
Mr. Herrick E. Hanks
Re: 1610(017)

The power transmission window is another reason for reservations with Alternatives C and D of the RMP. Once again, we have the BLM crossing private lands without notification to the land owner.

38-2 In looking back, the first powerline that went through our land was thought to be the last and we reasoned that it couldn't be stopped. However, it has been the death of our scenic land. The Environmentalists ask for their wilderness areas; we object to the window in our area. Our land needs to be free of megawatts of transmission lines.

In conclusion, I need to state that Environmentalists continue to blame the rancher for the loss of vegatation in the Rio Puerco Area. This year, however, the grass is plentiful. I bring this to your attention since it was not due to any program thought up by the BLM. It was due to the good rainfalls of early spring.

Theconcerns aforementioned are very important to me. I anticipate that they will be considered in adjustment of the Resource Management Plan. The plan should be made acceptable to all, since it is a plan that should work for us, the users of the land. This plan must consider the best alternatives for this area for many years to come.

Sincerely,

Celestino S. Casaus

cc Senator Pete V. Domenici
Congressman Manuel Lujan Jr.
Congressman Bill Richardson
Governor Tony Anaya
File

Responses to Comment Letter #38.

38-1 **The ORV recreation trail (Pocket Map E in the Draft) was designed to avoid as much private land as possible. An easement through private land would have to be obtained during site-specific planning in order to utilize any routes crossing private land. If this cannot be acquired, the trail would be rerouted.**

38-2 **We assume Mr. Casaus is referring to private land in T. 18N., R. 13W., Section 1, N 1/2. This land is not within a rights-of-way window. It is, however, within the north-south rights-of-way corridor which would be established along an existing powerline. There was no attempt to display the complex land ownership pattern on Map B. The corridors were established primarily in areas with public lands. At this time no transmission lines are proposed for this rights-of-way corridor. If a line is proposed in this corridor in the future, the right-of-way applicant would have to negotiate with the landowner for permission to cross private land.**

39

1522 Stanford NE
Albuquerque, NM 87106
June 23, 1985

Mr. Herrick E. Hanks, Area Manager
Bureau of Land Management
Rio Puerco Resource Area
P. O. Box 6770
Albuquerque, NM 87197-6770

Dear Mr. Hanks;

I wish to submit comments for the record on the "Rio Puerco Resource Management Plan and Environmental Impact Statement". I have been interested in management of public lands in the Rio Puerco resource area for many years, beginning in the mid-1970s when I was a member of the Multiple Use Advisory Committee of the Albuquerque District of BLM. My analysis of the document has taken several days -- far more time than you should expect people who do not do this for a living to spend analyzing a proposed Federal action, regardless of their level of interest. In a separate letter I will make some recommendations about how this documents could have been written so that it was more comprehensible and could have been more expeditiously read by people such as myself with limited volunteer time. I hope that my suggestions will be useful to other Resource Area Managers. Documents which are not well-organized for easy and efficient reading by the general public discourage citizen participation.

It is quite clear from the analyses in the plan that current management practices (Alternative A) need to be modified to more fully meet the mandate of Congress to manage resources of the public lands for multiple use and sustained yield (with emphasis on the latter). Similarly, it is clear that Alternative C is inconsistent with this mandate. Maximization of resource development would adversely impact many important resources on public lands, including wildlife, cultural resources, paleontological resources, soil, water quality, and vegetative cover. My comments will concentrate on Alternatives B and D which are the only reasonably acceptable alternatives.

Alternative B provides the best long-term protection for both renewable and nonrenewable resources and clearly should be the preferred alternative. I understand that in proposing Alternative D as the preferred alternative, BLM believed it was compromising between resource conservation and resource production. However, Alternative B is a compromise in itself, and does not represent the best resource conservation options available to the BLM. A number of examples illustrate this point. 1) Many of the special management areas (SMAs) are of minimal size to protect the resource for which they would be established. 2) A relatively small number of roads are being closed. 3) Two areas will be open to ORV events which will be very destructive to the land. Competitive ORV events in any location are destructive, even when ostensibly held on existing roads and trails. Optimal consideration of resource conservation would preclude any of these events. 4) Livestock still has precedence over wildlife. Some land in poor condition will not be improved, other land will not be sufficiently improved, and some conflicts between wildlife and cattle will not be resolved. 5) The current public demand for fuelwood is probably insatiable. Futhermore, it is falacious to

assume that designating additional land for legal harvest of greenwood or dead and down wood will significantly diminish the rate of illegal harvest in the long term.

Therefore, I urge you to reconsider the management direction of your proposed preferred alternative, modifying it further to provide better long term protection for all the resources of the area.

Following are specific comments about various issues and resources.

Fuelwood Supply

The fuelwood supply issue is a particularly bothersome one. The Plan and the EIS need to treat the issue more thoroughly. Is there any baseline data which will be available for use in the future to determine whether providing additional acreage for legal wood-gathering has diminished the amount of illegal gathering? Where is current illegal gathering occurring, and how do the proposed areas relate to this? To what degree will they really solve the problem? How much wood can be cut from a pinyon-juniper forest and still guarantee sustained yield in the same forest? What is the justification for selecting 17,300 acres in the Ignacio Chavez area for intensified fuelwood gathering? What environmental impacts will result from this specific decision? How much wood will be allowed to be taken from this area? Will opening the Ignacio Chavez area lead to the appearance of additional roads, disrupted habitat and wildlife, erosion, water quality degradation, additional hunting pressure?

39-1

What is the justification for the statement in a number of locations in the document that failure to provide silviculture treatment to pinyon-juniper woodlands will ultimately lead to a transition to brush/grasslands. Further, even if this can be documented, why the implicit assumption that this natural transition is not desirable? Is it not true that in many parts of the west, including this resource area, there is or has been an active program designed to convert pinyon-juniper woodland to grassland by physical and chemical means?

There seems to be an inconsistency in the descriptions of Alternative D regarding fuelwood supply on pages 2-42 and 2-45. Page 2-42, right column, first paragraph states "about 17,300 acres in the area... would be open for intensive fuelwood cutting". Page 2-45, Section 5, states "Fuelwood would be available to the public through commercial or home-use sales from approximately 9,320 acres of public land under this alternative." Please explain this discrepancy.

39-2 Are you aware that the New Mexico BLM Wilderness Coalition has proposed that the Wilderness Study Areas in the Ignacio Chavez area (Ignacio Chavez, Chamisa, Empedrado, and La Lena be combined into one wilderness area, closing roads between them? I request that consideration of expanding wood-cutting in the area between Ignacio Chavez and Chamisa WSAs be suspended until the Wilderness issues are settled -- not only by BLM recommendation, but also by Congressional action. This is consistent with your own planning criterion of not making fuelwood available where harvesting would degrade the scenic or wilderness values of the area.

Coal Leasing Suitability Assessment

I strongly endorse the restricted definition of coal development potential used to identify those areas which will be considered for leasing, given the location of this planning area, the many resource conflicts, and the quality of the coal in the area.

39-3 Table 2-7 summarizes your findings that leasing suitability assessment will have no impact on any of the public land resources -- which in a narrow sense is true. It would be appropriate to give some consideration to the potential impacts of coal mining on these resources in order to evaluate whether the decision should be made at this stage that there be no further leasing of coal in the resource area. Conceivably the resource conflicts could be so great that coal mining would be inappropriate in this resource area. Alternately, do you believe that application of the unsuitability criteria guaranteed an adequate consideration of this alternative?

39-4 The plan provides no justification for the decision in Alternative D (page 4-37) that "the majority of the coal resource in the area of maximum development potential...would be considered acceptable for further consideration for leasing", whereas Alternative B (page 4-18) states that "5,720 acres would be carried forward to the coal activity planning stage. Approximately 2,300 acres...would be considered to be unacceptable". What is the reason for this difference? If there are valid environmental reasons for bringing fewer acres to leasing under Alternative B, what justification do you have for changing the criteria in Alternative D?

Wilderness Study Area Management

39-5 The statement on page 2-19 regarding Sierra Club, et al v. Watt, et al. should be updated to reflect the decision in the suit in favor of the Sierra Club position.

Off-Road Vehicle Designation

39-6 Road closures, area closures, and the policy of limiting travel to existing roads and trails proposed in Alternatives B and D are a minimum for protection of the many other environmental values of the resource area. I am particularly concerned about the proposed competitive event areas. I find no discussion in the document of the current condition of these lands and their resources, and their fate in the future after many years of competitive ORV events. What will be the damage to adjacent waterways, the contribution to soil erosion, vegetation damage, wildlife disruption? I appreciate that BLM is under considerable pressure from people who like to ride dune-buggies and motor bikes of various sorts and sizes off-road. However, first and foremost it is the responsibility of BLM to protect the natural resources of the land -- from recreationists if necessary.

39-7 Table 2-7, page 2-56, Wildlife Habitat, Alternative D, Issue 2, states "(impacts) same as Alternative B, except a smaller area would be protected". This conclusion is not consistent with all other documentation I can find about the ORV designation proposals for Alternatives B and D which appear to be identical. If Table 2-7 is correct please explain the decision and the justification for it.

Special Management Areas

39-8 I commend the BLM for its proposal to provide special management for twenty-two areas with special resource values. I am concerned that some of the smaller areas in particular do not have enough acreage associated with them to provide adequate protection. For instance, the Jones Canyon area is only one section of land and I believe there is justification for a larger area. Please explain the reason for the size of this area. Other areas for which I request a discussion of their limited size are Pelon Watershed, Azabache Station, Big Bend Mesa, Petaca Pinta, and Cabezon Peak. The New Mexico Wilderness Coalition has proposed that the Petaca Pinta WSA be 14,800 acres and the Cabezon Peak WSA be 7,984 acres.

39-9 In addition to the 22 designated SMAs, I urge you to specifically designate all Wilderness Study Areas (WSAs) as Special Management Areas in this management plan. Such designation would be consistent with your criteria because as WSAs they are currently de facto "special management areas". More importantly however, BLM should plan to consider for special management any areas which are not ultimately incorporated into the Wilderness Preservation System. These areas clearly have values worth protection or they would not be wilderness study areas. Inclusion of all the WSAs in the SMA category now would facilitate the development of appropriate management plans for these areas in the future, without a Plan amendment.

39-10 Documentation of the nature of restrictions on mineral leasing and development, acres withdrawn, surface occupancy limitation, etc., which will result from special management on the SMAs appears on page 4-9 and in Tables 4-2 and 4-3. In addition, it is stated on page 4-9 that in SMAs non-consumption values are emphasized at the "expense" of minerals resource development and that "the short- and long-term impacts of these actions (SMA designation) would be to reduce the land available for fluid mineral development and to increase the expense of development on the affected lands". However, I find no information about the specific minerals involved in each SMA, the economic value of minerals on lands made unavailable by SMA restrictions, or the relative value of such minerals compared to minerals still available in this and other resource areas. In other words, just what "expense" are we incurring by protecting these lands and resources? From local, state, and national perspectives is it great, or is it relatively minor compared to resources available elsewhere, and compared to the value of the natural and cultural resouces being protected? Table 4-3 is very misleading because it gives acreages withdrawn from mineral leasing with no indication of the mineral potential of the withdrawn land.

It is pointed out in the plan that erosion and sediment production would be greater under Alternative C than B and D because of fewer SMAs. It would be useful to make some estimates about the degree of difference between these alternatives.

Grazing Management

39-11 I find no justification for the differences in AUM adjustments and the number of allotments receiving adjustments among the alternatives. This can't be simply a numbers game. In fact the data presented provides strong justification for maximum AUM adjustments and optimum reductions in wildlife conflicts. Without some strong evidence that Alternative D is the preferred alternative in this area, your own data argues to the contrary. It is conceivable, in fact, that in the long-term elk will be of greater economic significance to New Mexico than cattle (as a source of meat, and as a source of revenue from hunters). It would be prudent, therefore, for the BLM to emphasize protection of elk habitat and migration routes by reducing conflicts with cattle and people.

Wildlife

39-12 Why does Alternative D propose not to address wildlife conflicts on allotments 0114, 0115, 0552, and 0066 (La Jara -- also shown as 0666)? The La Jara allotment is said to have significant elk winter range conflicts and unacceptable forage conditions, and it appears that these problems will not be addressed.

39-13 The document should be much more specific about the long-term effects on wildlife populations if resource issues are not resolved as proposed in Alternative B. In addition, it should be more specific about the long-term beneficial effects of implementing all of the provisions of Alternative B on various types of wildlife populations . Which populations will increase, stabilize, or return, and where will this most likely occur?

Paleontological Resources

39-14 I strongly support the provisions in Alternative B for preservation of paleontological resources. I suspect that the plan does not go far enough in this regard, but, unfortunately, I do not have data to substantiate such a claim. I question the comment on page 4-37 that the impacts of Alternative D on paleontological resources would be "essentially" the same as those identified for Alternative B. What are the differences? Any differences are further justification for selection of Alternative B as the preferred alternative.

Resource Commitment

39-15 An Environmental Impact Statement must be specific about the irreversible and irretrievable commitment of resources under each alternative. Here and there in this document there are comments of this nature, but they are neither consistent nor comprehensive. Probably the easiest way to handle this requirement would be to compose a table which lists the irreversible and irretrievable commitment of resources by alternative. Losses of wilderness, soil, and cultural and paleontological resources are irretrievable. Furthermore, it is possible that we are at the point in history on western lands that the loss of habitat, vegetative cover, and certain plant and animal species will be irreversible and irretrievable. This possibility should be addressed.

In conclusion, I urge you to modify the preferred alternative to provide better protection for wildlife populations, cultural and paleotological resources, and natural areas, greater improvement in and protection of wildlife habitat, greater improvement in range quality, and less intensive fuelwood gathering.

Respectfully,

Phillenore D. Howard

Phillenore D. Howard, Ph.D.

Responses to Comment Letter #39.

39-1 The overall woodland program as defined at this time is very limited. Trespass cutting occurs throughout the RPRA in varying degrees. Trespass cutting may be related to the demand for the product and the supply authorized. The MSA contains further information on fuelwood trespass and is available for review at the RPRA Office.

The question of how much wood can be harvested under sustained yield depends on the particular stand being harvested. Specific volumes would be determined at the activity planning level. See the response to comments concerning the lack of specificity at the beginning of this section.

The Ignacio Chavez Grant area would not be intensively harvested. This editorial error has been corrected in the Proposed Plan. The 17,300 acres in WSA's would be under interim management guidance. If allowed under specific activity planning, the 17,300 acres could have silvicultural treatment applied to support other resource objectives. This might include wildlife habitat maintenance.

The assumption is made in the RMP that over time (hundreds of years) pinyon-juniper stands may decline to a shrub/grass condition, then reestablish. Some of the areas within the RPRA with pinyon-juniper encroachment may be reflecting a natural process, but this process has been influenced by grazing, past harvesting of ponderosa pine, and the removal of fire as a natural agent. Human presence clearly has affected the present situation. Therefore, in order to maintain pinyon-juniper stands, woodland management must occur.

The Special Management Area text for the Proposed Plan has been revised. The Ignacio Chavez SMA contains 1,700 acres of woodland/forest outside the boundaries of any WSA. This area, following activity planning, may be used as a source of fuelwood. This leaves 7,620 acres outside the Ignacio Chavez SMA that may be considered for woodland management (7,620 + 1,700 = 9,320 acres).

The 17,300 acres of woodlands referred to on page 2-42 in the Draft is within designated WSA areas. It is subject to interim management policy. If other resource objectives identified the need for forestry support, during activity planning, silvicultural practices could be applied to this area. An example would be a selective harvest operation conducted to maintain a critical wildlife habitat.

39-2 The BLM is aware of the New Mexico BLM Wilderness Coalition's proposal; however, the fuelwood cutting area between the Ignacio Chavez and Chamisa WSA's is a historical wood cutting area. The fuelwood cutting is not occuring on any existing WSA's and would not degrade any scenic values of the area. The BLM does not believe that the area between the WSA's has wilderness characteristics.

39-3 The potential impacts associated with coal mining and their effects on the physical and cultural environment are addressed in both the activity planning stage and during the mine plan approval process. The analysis of potential impacts in the RMP/EIS, beyond that required by regulation, would be inappropriate due to several factors. Any analysis would have to be based upon highly speculative assumptions that would be extremely difficult to quantify. In order to arrive at an adequate assessment based upon a very tentative set of assumptions, a worst case scenario would have to be evaluated. This type of analysis would obviously not lend itself to the construction of a realistic range of alternatives. Secondly, an analysis at this level of detail would be extremely premature. The development potential of mineral commodities such as coal is extremely difficult to characterize adequately, and even more difficult to predict on a long-term basis such as the life of this plan. See also the response to Comment 39-4.

39-4 It is the opinion of the BLM that the identification of areas having coal development potential, the application of the unsuitability criteria and multiple use screens, and the solicitation of surface owner views on leasing and mining constitute an adequate assessment of impacts relative to the potential for environmental damage. Any known resource conflicts of sufficient magnitude to preclude the identification of suitable leasing lands have surfaced through the application of the four "screens." Additional environmental protection will be afforded in the environmental analysis associated with activity planning and mine plan review.

The difference in acreage between Alternatives B and D is the result of the different emphasis on rights-of way corridors. Alternative B is intended to offer enhanced "protection" to the right-of-way corridor and window which adjoin the area having maximum coal development potential on the west. Under this alternative, coal development potential would be "sacrificed" to protect the future uninhibited and unrestricted development of transmission structures, principally pipelines, within the window and corridor.

Alternative D proposes to put coal development on a more even footing with rights-of-way corridor protection. Essentially all of the area having maximum coal development potential would be considered as suitable for further consideration due to the proposal to stage construction of pipelines and transmission structures. A pipeline constructed prior to coal leasing would be afforded "protection" by requiring the coal company to bear any relocation expense. Pipeline companies proposing to construct lines after leasing would be required to relocate their pipelines if development of the coal resource dictated removal. This compromise, as outlined in Alternative D, is considered to afford adequate protection to future rights-of-way as well as the potential coal development.

39-5 The text has been revised.

39-6 See Comments 29-5 and 29-6.

39-7 Table 2-7 is correct as written. Under Alternative B motorized vehicle use in the entire RPRA would be limited to existing roads and trails except for a few closed areas; however, under Alternative D some of the public lands in Cibola and Valencia Counties would be open, and all the public lands in Torrance County would be open to motorized vehicle use (see Map 2-14).

The "open" ORV areas in Cibola, Valencia, and Torrance County are in scattered or checkerboard parcels of land for which access is difficult due to intermingled private and State lands. The BLM believes this access problem will limit the off-road vehicle use of these lands. If these lands begin to become overused the BLM will limit these areas to existing roads trails.

39-8 See the response to Comment 27-14.

39-9 All WSA's are in Special Management Areas except Empedrado and a portion of La Lena. Identification of Special Management Areas was not based on wilderness considerations; instead these areas need intensive management due to other special resource considerations. See also the response to Comment 27-14.

39-10 Specific information concerning mineral commodities which may be impacted by special management prescriptions is contained in the Management Situation Analysis (MSA) and mineral resource assessments on file in the Rio Puerco Resource Area Office. Economic valuation of the affected mineral potential is not feasible or possible based upon the level of inventory currently available. Acres of relative mineral potential for most of the SMA's is the only reasonably quantifiable measure of impact.

A comparison of relative values between the minerals affected in the RPRA and those in other resource areas, although potentially enlightening, would be impossible to make based upon available information. Additional comparisons with natural and cultural resource values would be even more speculative and subject to interpretation.

39-11 See the response to Comment 16-9.

Both Alternatives B and D provide for the resolution of conflicts between wildlife habitat and livestock grazing use. Alternative B, however, favors wildlife habitat and watershed protection over livestock grazing use, while Alternative D provides for a balance of resource uses. Improvement in ecological condition and resolution of resource conflicts would occur more rapidly under Alternative B. Alternative D would also provide for improved ecological condition and conflict resolution, but would require a longer period of time to attain than Alternative B. Alternative D is the most multiple use-oriented alternative and therefore remains the Preferred Alternative.

The only elk habitat identified in the vegetative uses issue area is located in the Tent Rocks SMA. Within this SMA, critical winter elk habitat is found on one grazing allotment, La Jara 0066. An Allotment Management Plan will be developed for this area to provide for improved ecological condition and will be designed to minimize conflicts between livestock grazing use and this important elk habitat. In addition, a Habitat Management Plan (HMP) will be developed which will provide additional management for this area and assist in the resolution of conflicts with livestock grazing use. The development of these two activity plans will protect and improve habitat conditions, ensuring that elk will have the opportunity to increase in population and prosper within this area.

39-12 Allotment 0066 is discussed in the response to Comment 39-11. Allotments 0114 and 0115 involve a relatively minor amount of public land in relation to the private land surrounding it. As with the scattered tracts in Torrance County, it would be virtually impossible to implement management which would resolve resource conflicts. Allotment 0552 was put in the "Maintain" selective management category because its ecological condition is considered to be satisfactory and no significant resource conflicts were identified.

39-13 It is difficult to give a more specific analysis of the wildlife impacts given the general nature of the RMP system. See the response to comments about the lack of specificity at the beginning of this section.

39-14 Under Alternative D, the impacts on the areas having the most important and significant paleontological values, i.e., those paleontological sites identified for special management attention, would be essentially the same as those identified for Alternative B since the same SMA's are brought forward in each alternative to protect the most important paleontological values. Under continuing management guidance, the base requirements for protection of paleontological resources would be the same for each alternative. There are no differences in impacts between the alternatives to the most important paleontological values.

39-15 Irreversible and irretrievable impacts were fully considered and discussed in this RMP/EIS. If irreversible and irretrievable impacts were not mentioned in a resource section, no significant impacts were identified for that resource. The RMP did identify losses of soil, and cultural and paleontological resources as irretrievable impacts. The RMP proposals do not impact any designated Wilderness Areas because Congress has not designated any in the RPRA. Wilderness Study Areas have been found through the wilderness review process to have wilderness values. The RMP decisions will not apply to these areas if they become Wilderness because they will be managed under Wilderness Management Policy. Areas ultimately not designated by Congress as Wilderness will come under the guidance of this RMP.

40

(Typed for Reproduction Purpose)

Monday, June 27, 1985

From - Frank A. Walker
1200 Arizona NE
Albuquerqe, NM 87110

To - Herrick Hanks - Area Manager of Bureau of Land Management

Re - Comments on the Rio Puerco Resource Management Plan.
OFF ROAD VEHICLES ("recreational")

This is my opposition to permitting off-road recreational vehicles (i.e., motor-bikes, three wheelers, "tote goats," etc.) from traveling in any form upon our public lands.

This very afternoon I will be headed for the Eagle Peak and Mesita Blanca W.S.A.s, - they are a long way from Albuquerque. When my fiends and I arrive there (we will be there four days) we hope to find it in its serene natural state - in a state of solitude. That is why we're going all the way down there. Can you imagine our dissappointment if upon our arrival there was a group of bike riders roaring around over the area. Or for that matter even one. The noise and din would ruin the entire sense of the area's natural state - one couldn't really absorb the visual content of the area because it would already be polluted by the rasping roaring of unnatural sound. No birds could be listened to, no possible wild animals because everything would be thrown out of its natural continuity. The noise disrupts and terrifies habitat & ruins their patterned days of feeding and resting and interacting as they need to.

Another consideration is the physical damage to the contours of the land, and the resulting erosion. After that (and in concern for future generations) the lands become more and more scarred and more and more ugly. Then, in time, big arroyos change roadways, clog drain pipes, fill stock ponds, and dams. The evidence is rampant throughout the Southwest and all around New Mexico.

I am sixty-three years old and I have witnessed such damage in many places in New Mexico - all within my lifetime. Tracks and car "paths" - vehicle tire pressure damages the land much sooner than I believe many bikers perceive because the damage isn't always instantly perceptible. The tracks not only scar the land - visually but cause its ultimate deterioration until it can no longer support an ecology which sustains the lands from becoming an ever growing long-term liability. Off-road vehicles devastate that stability in numerous ways. Ultimately all people, whole families, all age levels must pay a heavy price* for the destruction caused by recreational vehicles being permitted to use any than those public areas designated for that purpose.

Thank you,

/s/Frank Walker

*That is an economic price - not just an "aesthetic" price.

No substantive comments in Letter #40.

41

(Typed for Reproduction Purpose)

PETITION

WE, THE UNDERSIGNED PETITIONERS, ARE CONCERNED WITH INCREASED AND UNCONTROLLED USE OF PUBLIC, STATE AND PRIVATE LANDS BY MOTORCYCLES AND OTHER OFF-ROAD VEHICLES. WE ENCOURAGE B.L.M. AND OTHER LAND MANAGEMENT AGENCIES TO ENACT REGULATIONS TO RESTRICT AND CONTROL SUCH USES. SERIOUS CONFLICTS ARE ALREADY BECOMING APPARENT WHICH JEOPARDIZE THE LIVESTOCK INDUSTRY, WILDLIFE, PERSONAL SAFETY, THE LOCAL ENVIRONMENT AND OTHER RESOURCES. WE SUPPORT STRONG RESTRICTION, NOT TO OUTLAW O.R.V. USE-ALTOGETHER, BUT TO REGULATE FREQUENCY, AREA AND INTENSITY OF SUCH USE.

A total of 323 signatures to this petition were received.

No substantive comments in Letter #41.

42

Walton Hawk
Box 40
San Cristobal, NM 87564

May 7, 1985

Herrick E. Hanks, Area Manager
Bureau of Land Management,
Rio Puerco Resource Area,
PO Box 6770,
Albuquerque, New Mexico   87197

Dear Manager Hanks:

Thank you for sending me Rio Puerco Resource Management Plan And Environmental Impact Statement. I believe that Alternative D: Balanced Management/Preferred Alternative is the most suitable management plan.

Since they are mentioned in this plan, I want to ask you about two subjects that concern me, and I plan to continue to question public land managers about until I receive answers.

42-1 Do you plan to keep Off Road Vehicles on designated trails and roads? By all accounts I have seen, time has proven that ORV use not on trails and roads is incompatable with other uses of the land, soil conservation, and habitat protection. Popularity of such a distructive use does not justify it.

42-2 With the increasing concern about the future status of the Piñon tree, I fail to see how continued "Piñon-Juniper Controle" can be justified. How come projects to distroy these trees are still being planned? During recent meetings on the Carson National Forest Plan, past projects of such tree distruction came under extensive critisizem some of it from sources new to me. The juniper is also an important plant to many forms of native wildlife. I believe you should be substituting Research Natural Areas for the Pinon for distruction projects.

42-3 I do not believe that most of the BLM Wilderness Study Areas qualify for Wilderness System status. Why can they not be classified as Special Management Areas to protect thier current qualities? This would take away some of the pressure for more Wilderness, in areas that do not meet all the deffinitions of Wilderness.

Sincerely:
Walton

Responses to Comment Letter #42.

42-1 The Proposed RMP/Final EIS proposes to confine ORV traffic to existing roads and trails in the majority of the RPRA (see Map 2-14). See also the response to Comment 8-1.

42-2 The proposed forestry action presented in the RMP does not call for the destruction of pinyon-juniper (P-J) woodlands. Designated existing P-J stands would be placed under woodland management. Silvicultural practices would be applied, through activity planning (see the response at the beginning of this section to comments concerning lack of specificity), to improve the woodlands. Harvesting of fuelwood would be at or below sustained yield levels. Greater protection of the woodlands from trespass cutting would result from designation of woodland management areas.

The RMP does propose possible "weeding" operations to remove encroaching P-J from ponderosa pine stands. This would improve the ponderosa pine stands and the wildlife habitat which the ponderosa pine type supports.

The Divide MFP decisions which have been carried forward (see Appendix A in the Draft) call for the establishment of study plots for P-J in the Malpais area south of Grants. Many of the proposed Wilderness Areas contain P-J stands. Designation of Wilderness Areas would protect this P-J habitat from human intrusions.

42-3 The question of whether the BLM Wilderness Study Areas qualify for Wilderness designation is currently the subject of considerable study throughout the Bureau. The RPRA has examined the Wilderness suitability of five WSA's in the Wilderness Draft Environmental Impact Statement dated May 1985. The remainder of the WSA's are planned for Wilderness suitability analysis during Fiscal Year 86. This analysis is entirely separate from the RMP and the identification of SMA's.

43

Herrick E Hanks, Area Manager
Bureau of Land Management
Rio Puerco Resource Area
Albuquerque New Mexico

P O Box 1558
Corrales NM
June 26, 1985

Dear Rick Hanks:

Although we have read through most of the sections of the Rio Puerco RMP, and generally accept alternatives B or D, we are going to comment primarily on land and off road vehicles.

As you are very much aware, the recreational ORV users are a fact, their numbers are quickly increasing, and they are going to drive on B L M land. They will have to be accommodated and controlled to minimize their destructive impact.

We believe you are on the correct course by designating specific areas for the specific types of ORVs. In fact, the areas which you have chosen for dune buggies, technical climbers, and overnight tourers demonstrate your intent to reasonably solve this problem. They will go somewhere, and this approach seems like the "least of the evils". However, the "Oh My God 100" phenomenon, or anything like it, gives us immediate cause for alarm. Since this annual event at the edge of and within the "Ojito WSA" has begun, we have seen an inexorable increase in inroads and destruction within the "Ojito". It is obvious that some of the "Oh My God 100" people come back later to "do their own thing" within the "Ojito". (Even making their own courses in the Wilderness Study Area!) They crosscountry encroach upon it from primarily the north and south (a direct spinoff from the authorized course). Although they are also drawn into the WSA by following illegal woodcutter's pickup tracks along the south boundary.

Since we could find no indication in the Rio Puerco RMP that you have done any detailed, systematic, documentation of the obvious damage that ORVs do to the very fragile soils within this area, we have put together this series of 35mm slides which we have taken to show some of the tracking, destruction, and subsequent erosion caused by ORVs in the "Ojito WSA".

(The two areas, A&B, where the photographs were taken are shown on the accompanying map.)

Area A

1. Dirtbike track(course) where it deviates from (leaves) illegal woodcutting road
2. Dirtbike track continuing on down ridge
3. Dirtbike track (in middle distance) diving down fragile (Morrison Fm) escarpment
4. Same (showing subsequent erosion) and continuing on across silt flat

Area B

5. Two rock cairns left by ORVers to mark dirtbike course where it crosses road and leads down a ridge
6. Dirtbike course and tracks deviating from it
7. Runover and fractured rock in course
8. Runover bushes in course
9. All of 6., 7., and 8. phenomenona in one spot
10. Dirtbike course continuing off ridge and on and on. Note faded orange flag(on a wire stem) in track 1/3 down from top of slide.

Certainly, recreational ORVs should be far away from Wilderness Study Areas, and definitely not introduced to Wilderness Study Areas. 43-1 We strongly recommend that some people in your office be assigned to take up this documentation where we left off. (We just scratched the surface to enable you to see what lies below.) We are quite willing to take you to these areas to get you started on the project.

As to relocating "Oh My God 100" types and other recreational ORV users: We believe that adequate and specific areas and courses should be set up for them in the northern part of RMP area, where "semi-primitive motorized" zones predominate. They should there be confined to designated tracks within these confines, so that what trackless land that still remains is not torn up as in the "Ojito WSA".

Sincerely,

Arthur Loy

Arthur Loy

Jan Cummings

Jan Cummings

Response to Comment Letter #43.

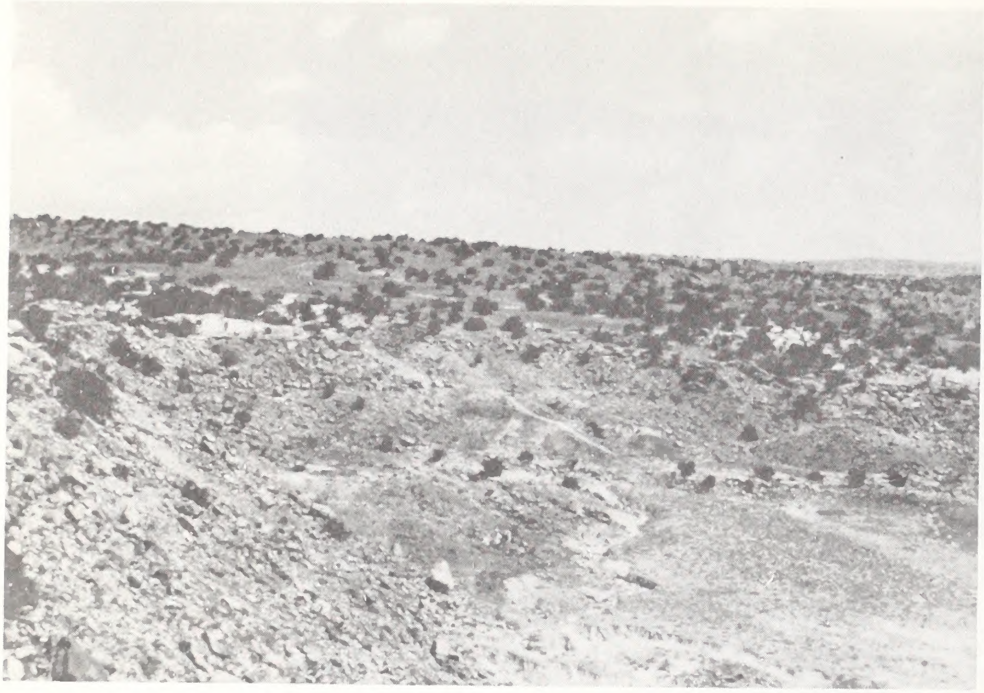
43-1 Additional monitoring and documentation of ORV damage in the Ojito SMA will be initiated. Currently this region is under Wilderness Interim Management. Your submitted data will be incorporated into these responsibilities.

1.
Ojito WSA

Dirt bike track
where it leaves
pickup track

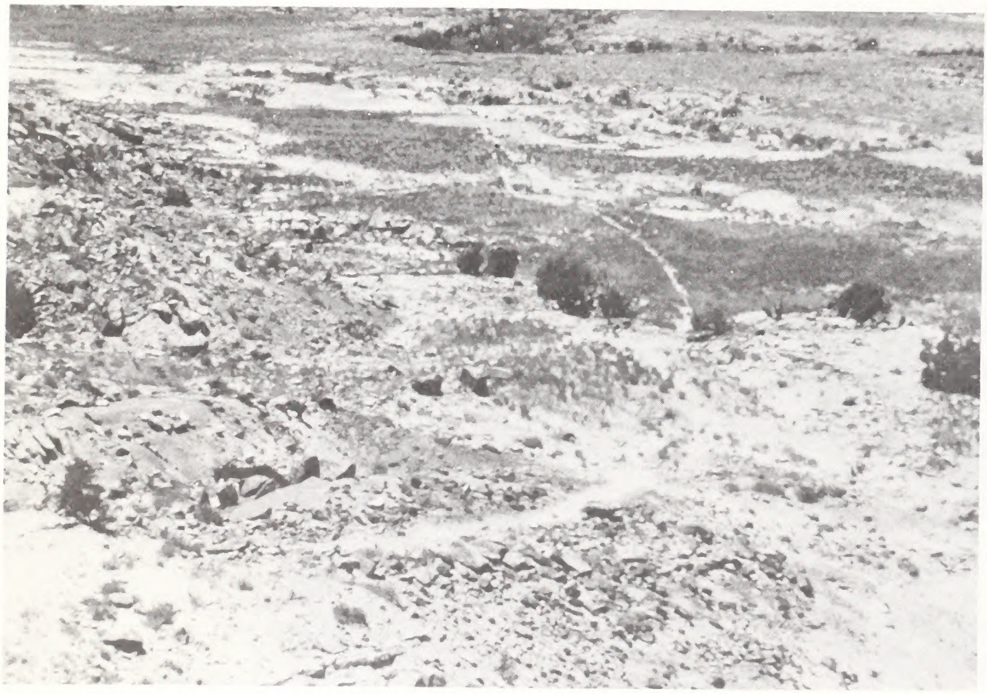
2.
Ojito WSA

Dirt Bike track
after leaving
woodcutters'
pickup track



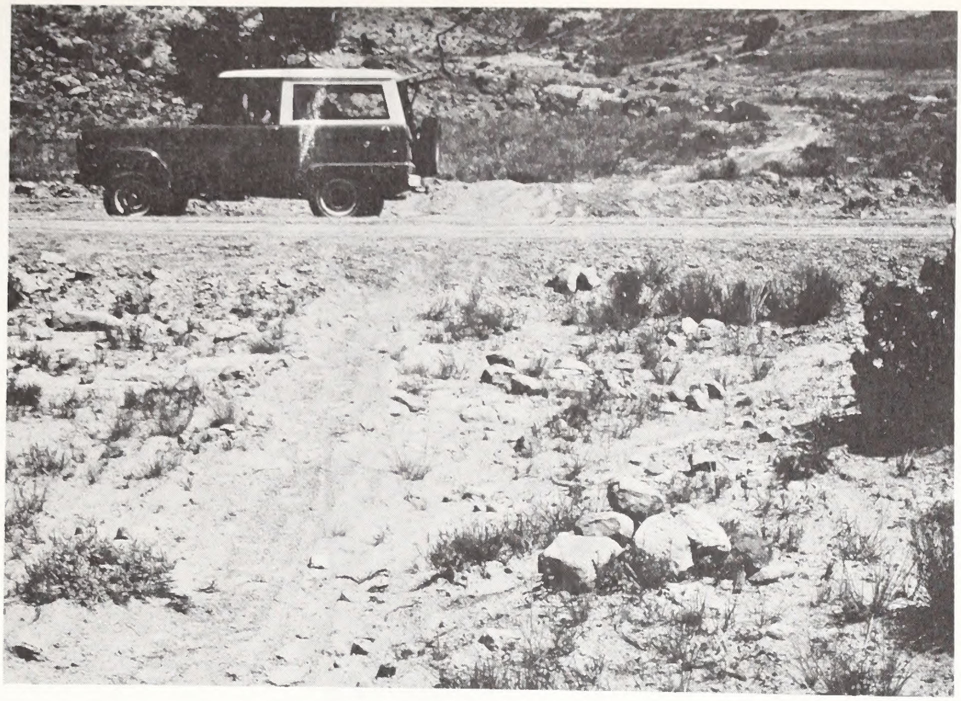
3.
Ojito WSA

Dirt bike track
down far escarpment



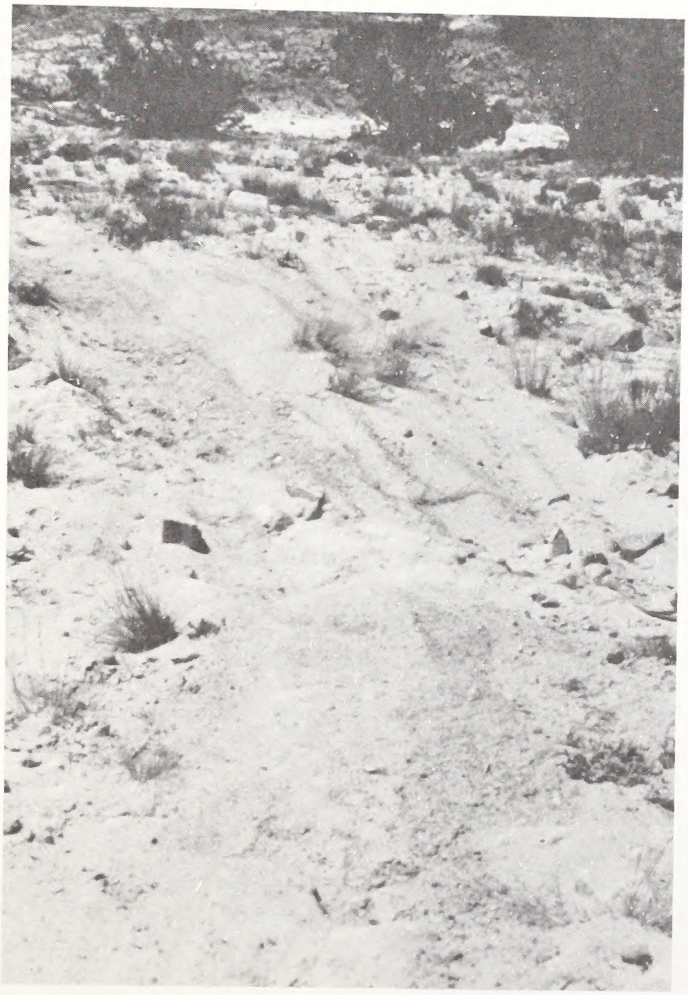
4.
Ojito WSA

Dirt bike track
down escarpment
and across flat



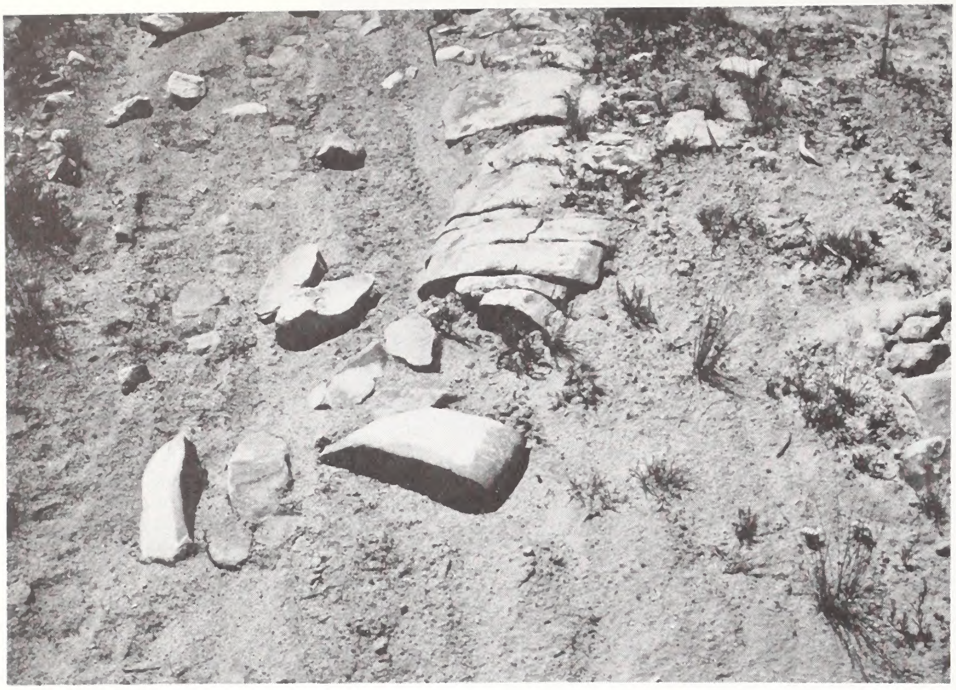
5.
Ojito WSA

Dirt bike course and rock cairn at road crossing



6.
Ojito WSA

Dirt bike course and deviating tracks

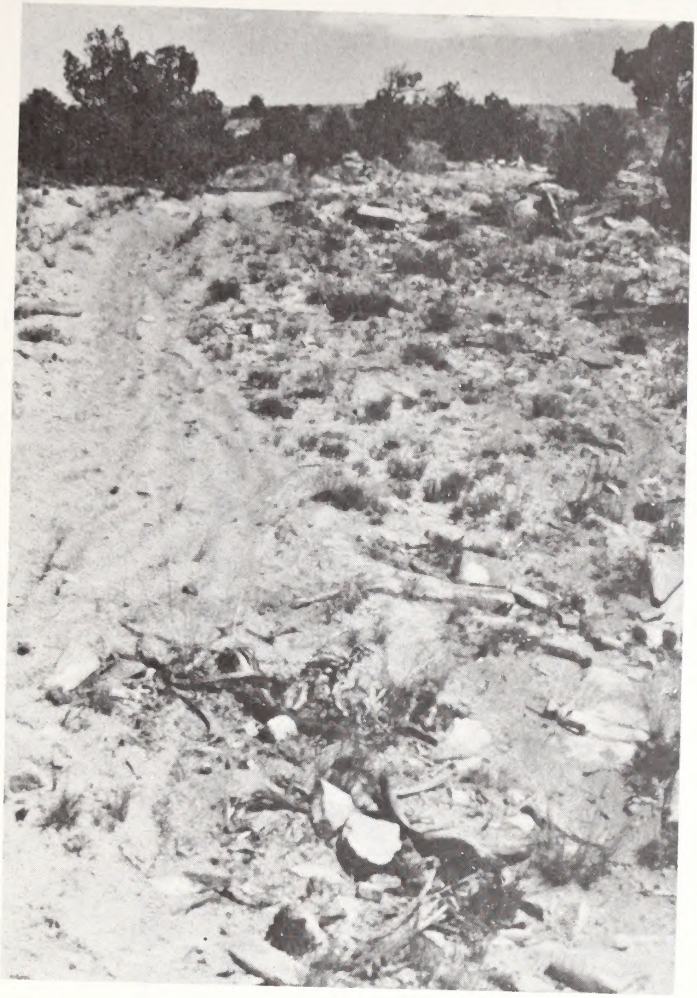


7.
Ojito WSA

Dirt bike course -
Runover Rock

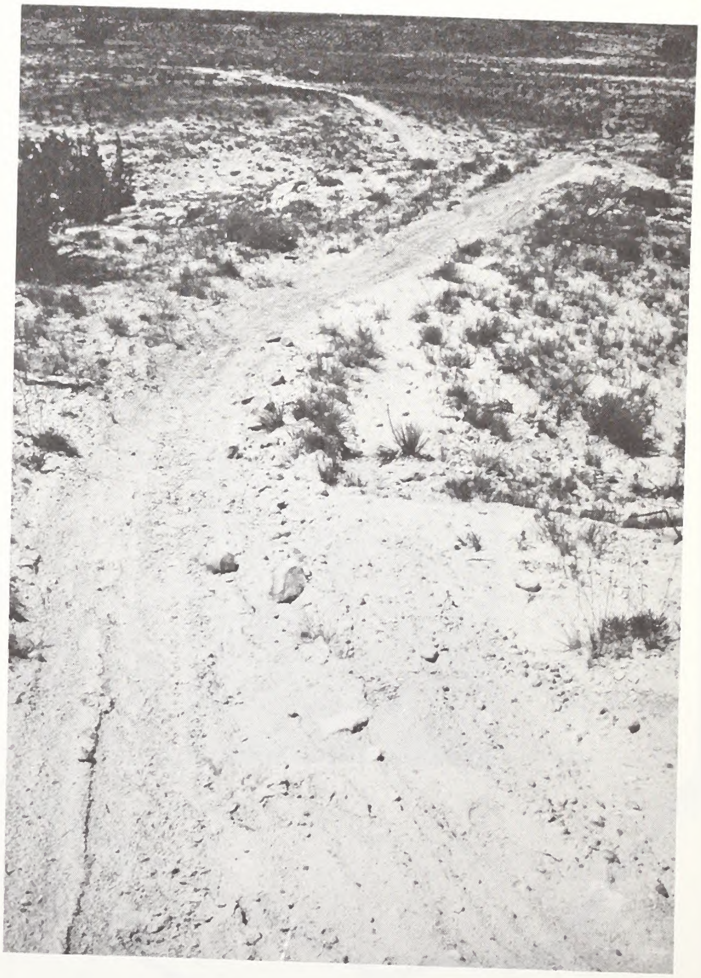
8.
Ojito WSA

Dirt bike course -
Runover bush



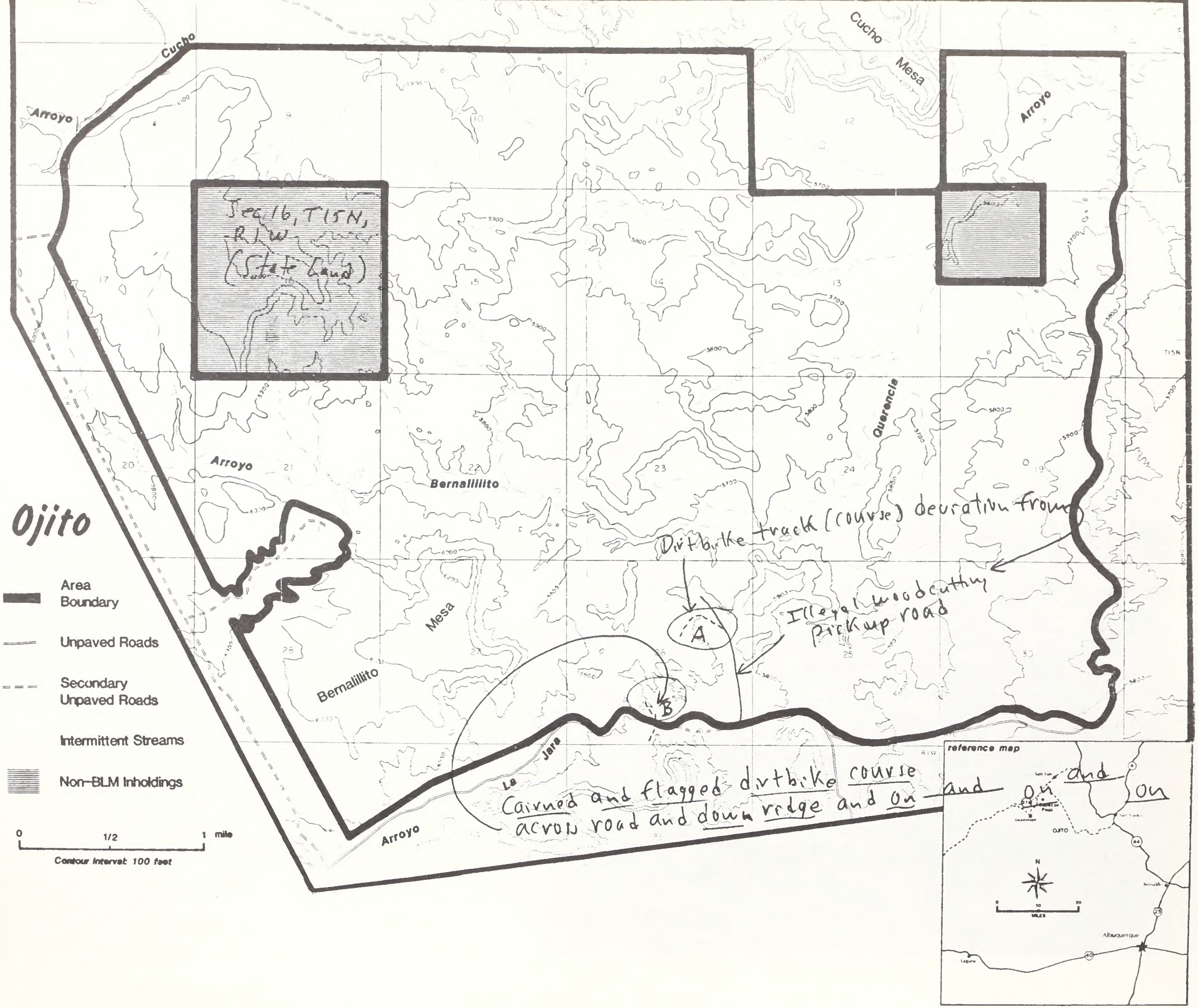
9.
Ojito WSA

Dirt bike course -
Deviating tracks,
runover bushes,
runover rocks



10.
Ojito WSA

Dirt bike course
continuing on.
Note flag in track
1/3 down from top.


Ojito
Area Boundary
Unpaved Roads
Secondary Unpaved Roads
Intermittent Streams
Non-BLM Inholdings
0
1/2
1 mile
Contour Interval: 100 feet
Cucho
Arroyo
Cucho Mesa
Arroyo
Querencia
Bernalillito
Arroyo
Mesa
Bernalillito
La Jara
Arroyo
T15N
R1W
reference map
OJITO
Albuquerque
Sec 16, T15N, R1W (State Land)
Dirtbike track (course) deviation from
Illegal woodcutting pickup road
A
B
Cairned and flagged dirtbike course across road and down ridge and on and on and on and on

44

(Typed for Reproduction Purpose)

June 17, 1985
620 Sierra Dr. SE
Albuquerque, NM
87108

Area Manager BLM
Rio Puerco Resource Area
Albuquerque

Gentlemen: Comments on the Draft RMP & EIS

44-1 1. FLPMA specifies that activities considered to be disqualifying are not to be allowed in WSA's. This not only applies to ORV use, but road building, firewood cutting, P-J cabling, range modifications, open-pit mining, and oil/gas drilling which were not established permits or leases prior to the Wilderness Act shut-off date (now 1 1/2 years ago.). This comment applies to all options in the RMP & EIS. Signing of exclusion areas is not addressed in the RMP.

44-2 2. The National Law pertaining to public utility corridors covers more than power transmission lines. It includes public roads, highways, railroads, pipelines for whatever purpose, and all other public utility distribution means. The corridor shown in the RMP may be optimised for a 4-Corners-to-Albuquerque transmission line route but how about the other uses? The intention was to eliminate a spider-web of different kinds of rights-of-way spreading over our lands.

44-3 3. Alternative B might be the best plan toward good land stewardship (no overgrazing, excessive soil loss, etc.)--How about the Savory Plan? No mention in the RMP.

44-4 4. You are urged to obtain drinking water rights along the Continental Divide Trail route as soon as possible; - even prior to trail building. In RMP?

Sincerely,

/s/CORRY McDONALD

Responses to Comment Letter #44.

44-1 Wilderness is not addressed in this RMP except as Continuing Management Guidance. See the response to Comment 27-14 for a discussion of the relationship of the Statewide Wilderness process to the RMP. The RPRA will continue to comply with the BLM Interim Management Policy and Guidelines for Lands Under Wilderness Review.

44-2 We are unsure of which law is being referred to. The rights-of-way corridor issue applies only to utility transmission lines, specifically electrical lines larger than 69 kV and gas lines six inches in diameter and larger. Other rights-of-way were not included when this issue was identified (see Issues and Criteria, Chapter 1 in the Draft). A Transportation Plan for secondary roads will be developed during activity planning to identify unnecessary roads that should be closed and areas where access should be acquired. The BLM receives very few applications for rights-of-way for highways and railroads so these applications are easily handled on a case-by-case basis.

44-3 Grazing system changes to improve ecological condition and resolve resource conflicts will be identified during Allotment Management Plan preparation. "Short Duration, High Intensity Grazing" is equivalent to the Savory Grazing Method. See Appendix O in the Draft for a summary of this and other grazing systems to be considered.

44-4 This will be considered during activity planning for the Continental Divide Trail SMA, but cannot be done until a treadway has been identified. See the response to comments concerning lack of specificity in the RMP at the beginning of this section for a discussion of the relationship between the RMP and future activity plans.

Appendices

APPENDIX A

SUMMARY OF MANAGEMENT FRAMEWORK DECISIONS

ADDITIONS AND CORRECTIONS

Page A-3 is a duplicate of page A-7 and should be deleted.

Chaco MFP, Page A-9

Two sentences should be added at the end of the Minerals Decision M-1.1 Summary which read:

(The Johnson Trading Post Tract will be considered for leasing. The Chico Wash South Tract would be considered for leasing only if additional coal drilling information is obtained, and additional cultural resource inventories are completed. These are the only two tracts recommended as suitable for further consideration for leasing in the Chaco MFP which are in the RPRA.)

APPENDIX C

SPECIAL MANAGEMENT AREAS

INTRODUCTION

This appendix includes descriptions of the Special Management Areas (SMA's) proposed in this RMP. The narratives include a general description of the area proposed for special management, discuss the special values, and outline the management objectives proposed for the area. The detailed management plans for these areas will be developed later during activity planning.

"No surface disturbance" as it applies to Special Management Areas will be defined on a case-by-case basis when the activity plans for the areas are developed. In general, an activity would be allowed as long as it does not interfere with the management objectives for the area.

The Special Management Areas proposed in this RMP are listed below and discussed in the same order in the Appendix. See Map 1-2 in the Draft for locations of these areas.

1. Torrejon Fossil Fauna
2. Pelon Watershed
3. Historic Homesteads
4. Canon Jarido
5. Jones Canyon
6. Headcut Prehistoric Community
7. San Luis Mesa Raptor Area
8. Azabache Station
9. Cabezon Peak
10. Ignacio Chavez
11. Big Bead Mesa
12. Canon Tapia
13. Guadalupe Ruin and Community
14. Elk Springs
15. Tent Rocks
16. Ojito
17. Ball Ranch
18. Pronoun Cave Complex
19. Continental Divide Trail
20. 1870's Wagon Road Trail
21. El Malpais
22. Petaca Pinta

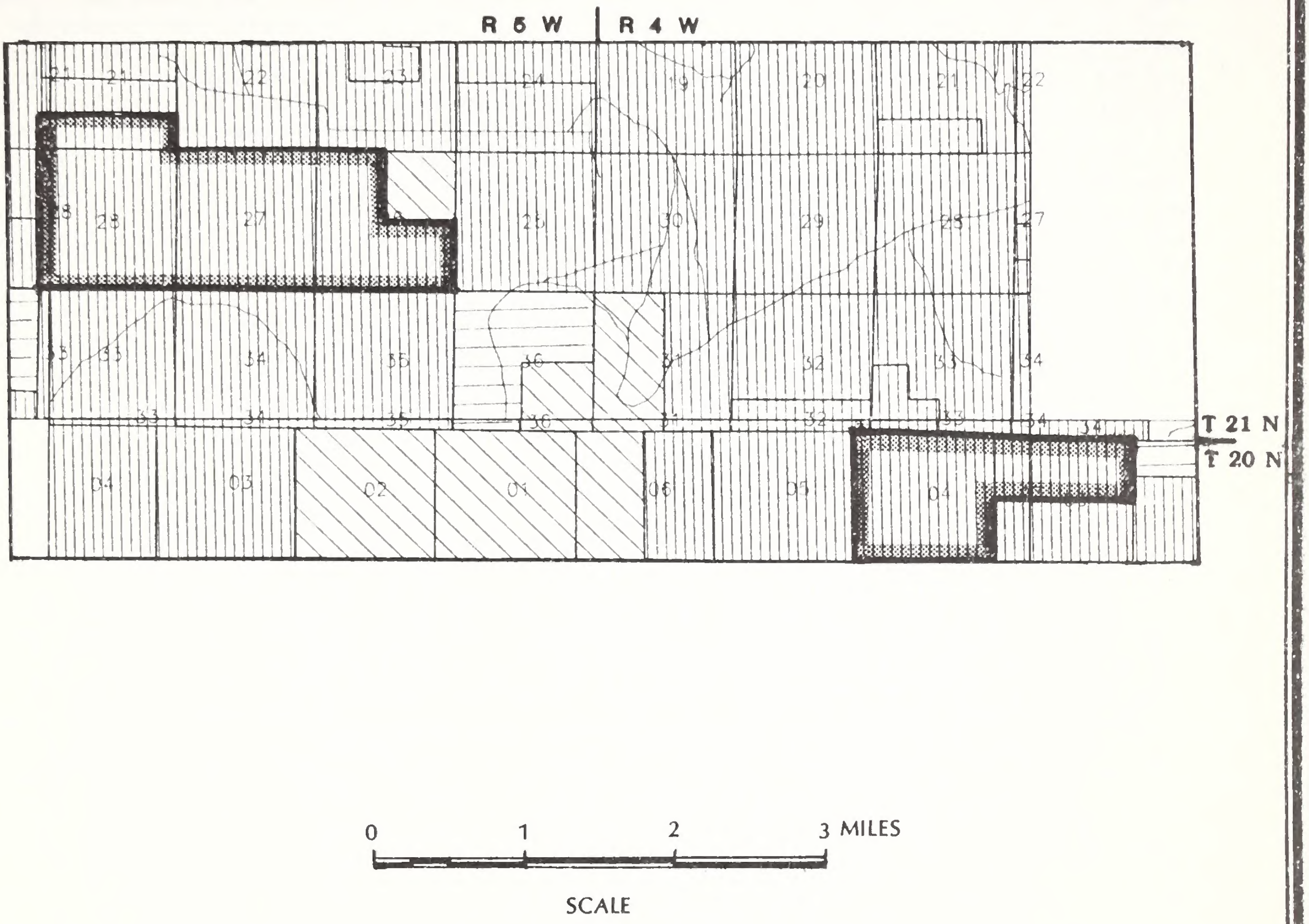
1. TORREJON FOSSIL FAUNA

General Description: Numerous authors, including Matthew (1937) and Wood and others (1941), have identified the area near the head of Torrejon Wash as a major collecting area for fossil mammals (see Map C-1). Wood and others formally defined this area as the type locality for Torrejon Fauna in an article in Volume 52 of the Bulletin of the Geological Society of America (Wood, et al. 1941).

A type locality is an important paleontological feature in that it represents the place at which a fossil assemblage is typically displayed and from which it derives its name. Type specimens of the Torrejon Fauna were originally recognized and described from this locale; thus the area represents a unique and irreplaceable resource.

Management Objectives: The goal of special management for the Torrejon Fauna Type Locality is to protect the area for scientific study. Access for scientific study will be maintained while unnecessary and undue degradation associated with mineral development will be prohibited.

The planned actions include: (1) Designate as an Area of Critical Environmental Concern; (2) Develop an activity plan; (3) Limit motorized vehicle use to existing roads and trails.



MAP C–1
TORREJON FOSSIL FAUNA

SURFACE OWNERSHIP

STATE	▤
BLM	▥
PRIVATE	☐
INDIAN	▧

N ↑

PAVED OR GRADED ROAD	——
PRIMITIVE ROAD OR TRAIL	----
SMA BOUNDARY	▩

ALL MOTORIZED USE WITHIN BOUNDARY LIMITED TO EXISTING ROADS & TRAILS

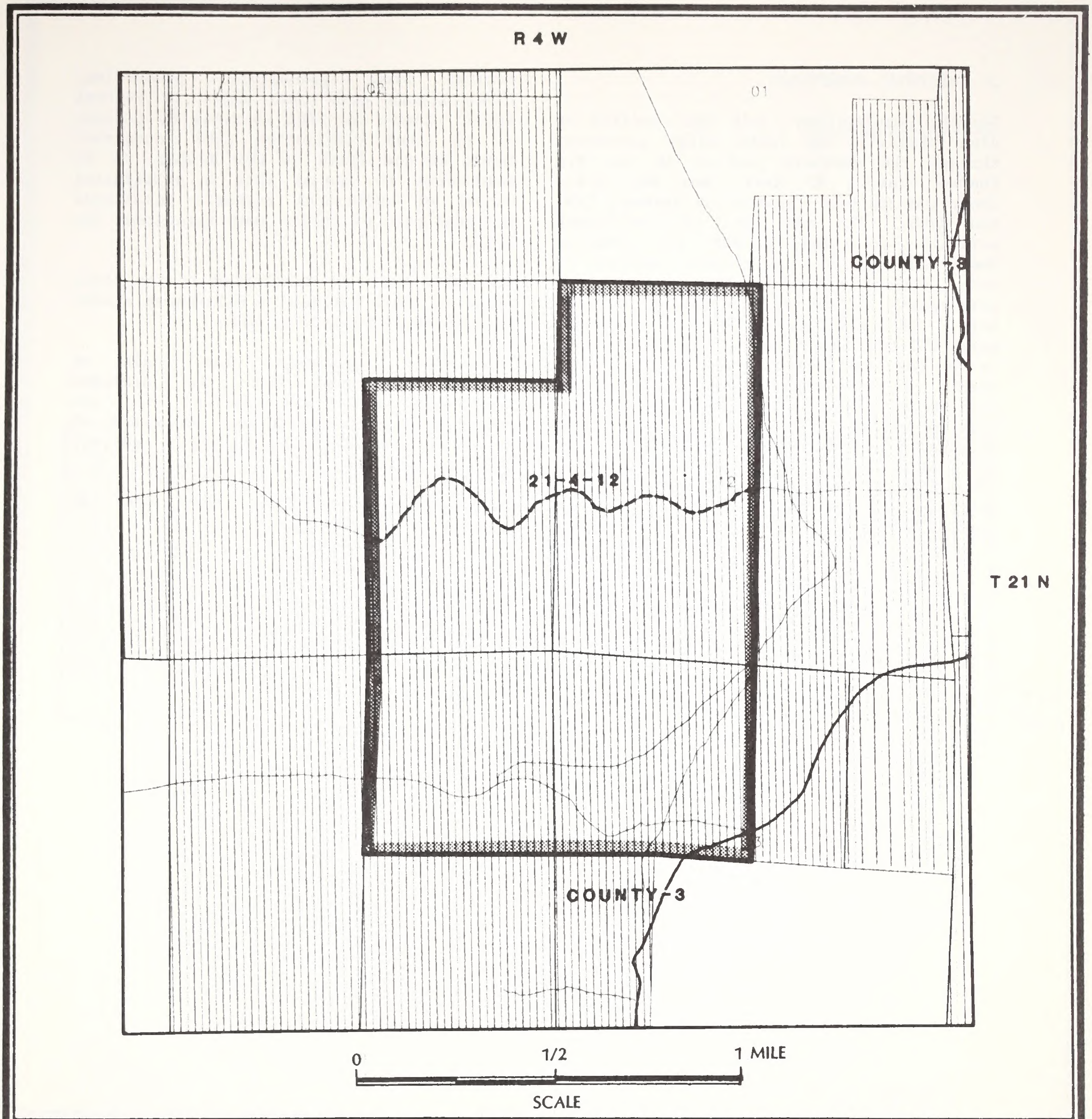
2. PELON WATERSHED

General Description: The Pelon Watershed, part of the Rio Puerco Hydrology Study, is approximately 436 acres in size (see Map C-2). Elevations range from 7120 to 7228 feet. Soils range from moderately fine textured in alluvial deposits to both coarse and fine textures on colluvial material derived from sandstone and shale. Rock outcrops are common along the rim of the watershed. Slopes are gentle to rolling in the lower and center part of the watershed but become very steep along the rim and below the sandstone and shale rock outcrops.

On alluvial soils the vegetation typically consists of western wheatgrass, blue grama, galleta grass, bottle brush, squirrel tail, sand dropseed, and big sagebrush. A woodland type is more typical on the upper slopes with pinyon, juniper, Indian ricegrass, blue grama, big sagebrush, mountain mahogany, antelope bitterbrush, Gambel's oak, and yucca the dominant species.

Management Objectives: The objectives for all three watersheds in the Rio Puerco Watershed Study (Pelon, Empedrado, and Querencia) are to monitor hydrologic responses to the Rio Puerco grazing management programs. Only through such monitoring can a determination be made whether the goals of the Rio Puerco Grazing ES (USDI, BLM 1978b) are being met. These goals include increasing the percentage of each allotment in a stable erosion condition, improving vegetative cover to reduce soil losses, and reducing peak runoff. The objectives of the Hydrology Study can be achieved only by allowing grazing in the study areas, but excluding all other surface disturbing activities, except for instruments and data collection.

The planned actions include: (1) Develop an activity plan; (2) Withdraw minerals; (3) Allow no surface disturbance; (4) Limit motorized vehicle use to existing roads and trails.



MAP C-2
PELON WATERSHED

SURFACE OWNERSHIP

BLM ▥

PRIVATE ☐

N ↑

PAVED OR GRADED ROAD ——

PRIMITIVE ROAD OR TRAIL —

ROAD CLOSED TO VEHICULAR USE - - -

SMA BOUNDARY ▨

ALL MOTORIZED USE WITHIN BOUNDARY LIMITED TO EXISTING ROADS & TRAILS

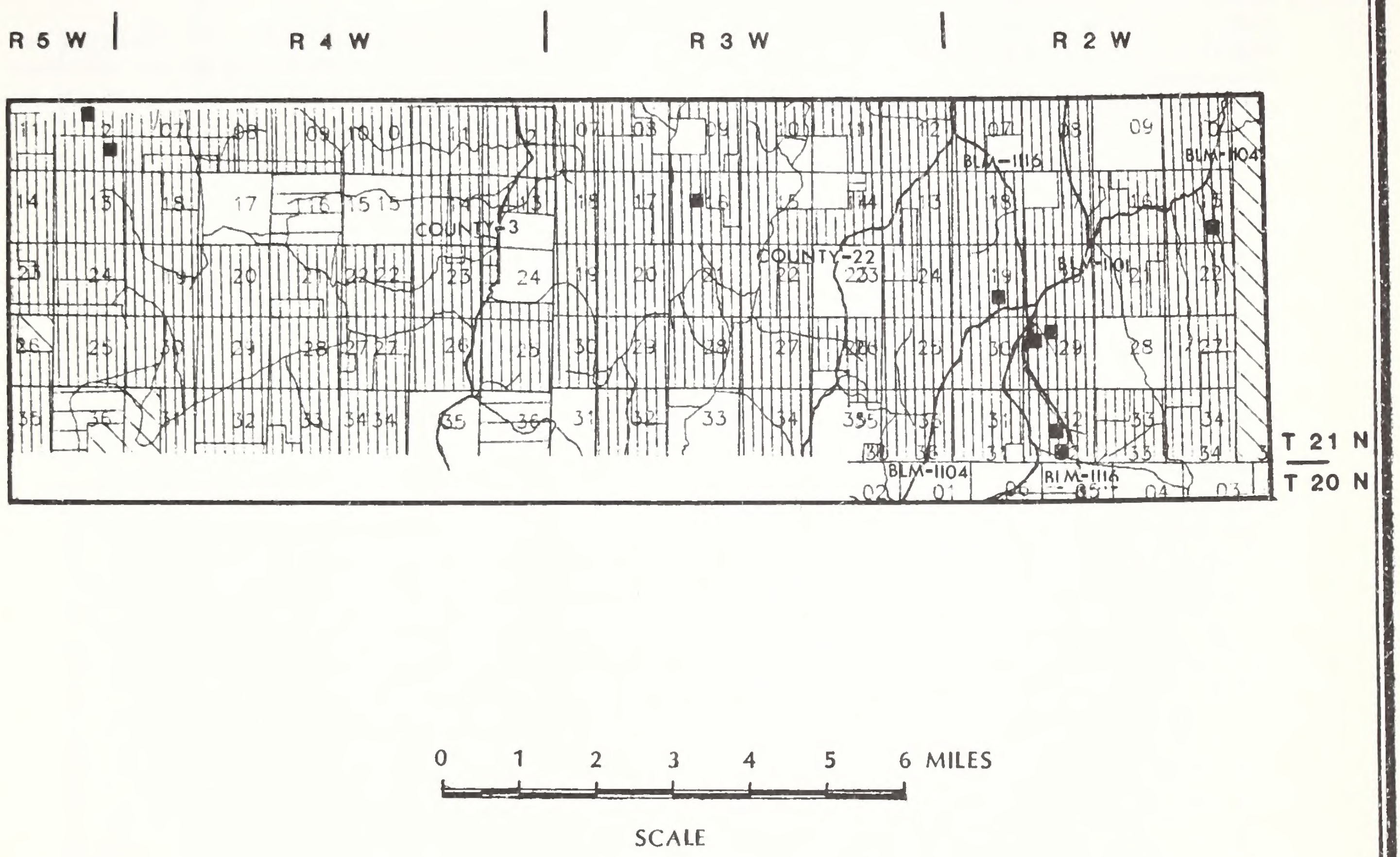
3. HISTORIC HOMESTEADS

General Description: This SMA consists of nine historic log cabin sites scattered through the northern portion of the Rio Puerco Grazing ES Area (see Map C-3). These cabins were constructed between 1900 and 1940, with the peak of settlement activity occurring around the 1920's. Homesteads in this area were settled by both Hispanics and Anglos; thus these settlements offer an intriguing glimpse into the historic roots of modern, multi-cultural New Mexico. The homesteads in the SMA came into Federal ownership as a result of the Bankhead-Jones Farm Tenant Act which authorized Federal purchase of privately-owned farmlands if they had originally been homesteaded. Known as land utilization projects, these submarginal lands proved to be incapable of producing sufficient income to support a family. The families were relocated and the lands retired from agricultural production. These tracts were then added to Federal lands. Since the RPRA contains 80 percent of all Land Utilization (LU) (acquired) lands in the State of New Mexico, it is reasonable to assume that a substantial number of additional historic homesteads are scattered on public land throughout the RPRA.

One cabin has been identified as the birth place of Euell Gibbons, a well-known author and proponent of natural foods.

Management Objectives: The goals of special management for the Historic Homesteads are maximization of the interpretive and educational potential of the sites, while protecting their inherent cultural values.

The planned action for this SMA is: Develop an activity plan.



MAP C-3
HISTORIC HOMESTEADS

SURFACE OWNERSHIP

STATE	□
BLM	▥
PRIVATE	□
USFS	▨

N ↑

PAVED OR GRADED ROAD	—
PRIMITIVE ROAD OR TRAIL	—
HISTORIC HOMESTEAD	■

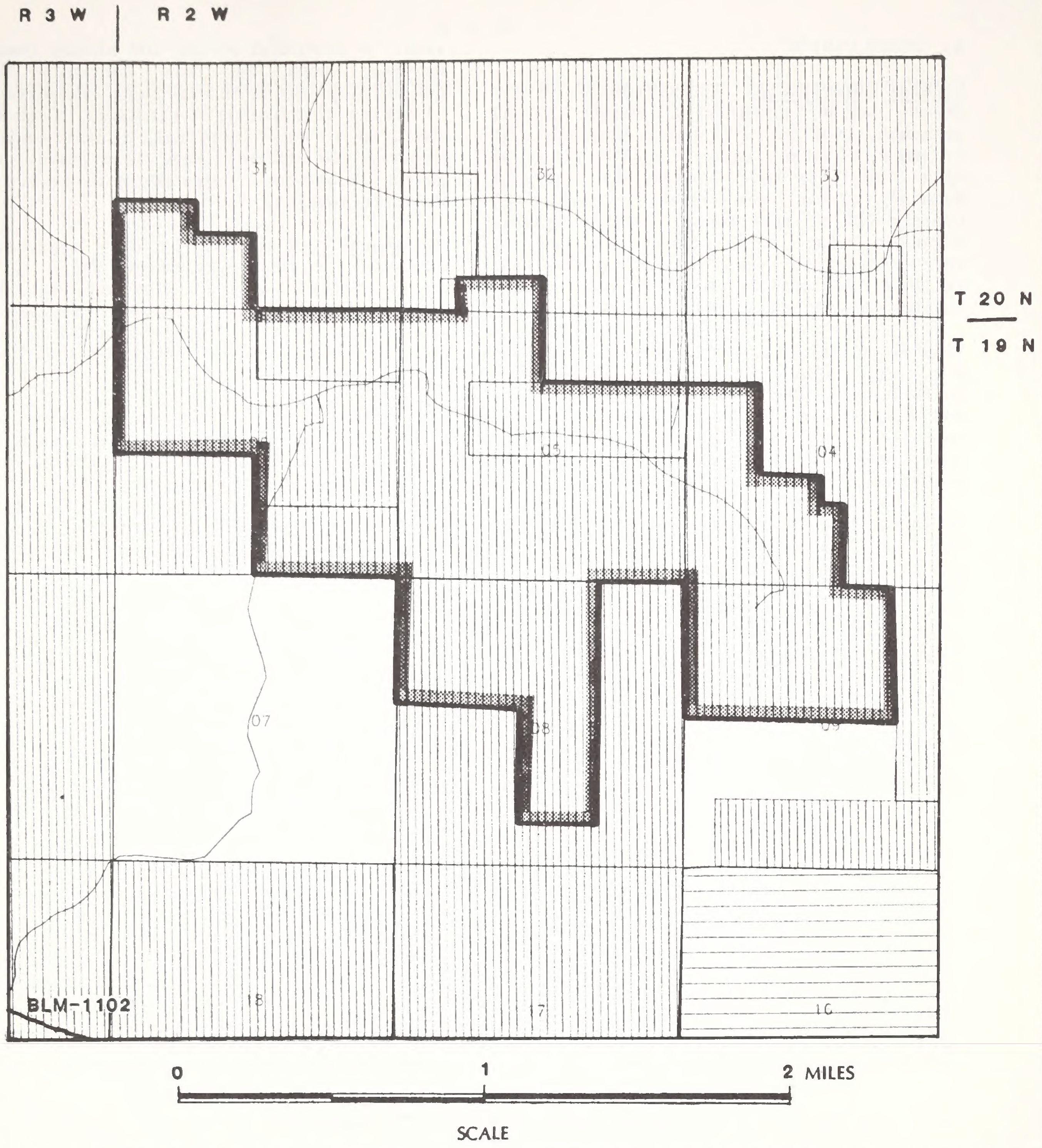
4. CANON JARIDO

General Description: Canon Jarido (see Map C-4) consists of a steep-sided sandstone canyon, approximately 100 feet deep, cut into Mesa Portales which provides raptor nesting sites. Lower elevations consist of sage cover interspersed with pinyon and juniper. This vegetative community progresses into ponderosa pine and Gambel's oak, also providing good mule deer habitat.

Five springs are located within the canyon, two of which are associated with historic homesteads settled sometime during the early 1900's. One cabin site is in excellent condition, while the second is in moderately good shape. To date, the deterioration has been due to natural causes, rather than vandalism. This relatively undisturbed cultural resource warrants immediate attention. Additional historic and prehistoric cultural materials have also been identified within Canon Jarido.

Management Objectives: Goals of special management for Canon Jarido emphasize management for scenic values, wildlife habitat, cultural values, and intensive recreation use, specifically semi-primitive motorized recreation opportunities (see Appendix 1).

Planned actions include: (1) Develop an activity plan; (2) Limit motorized vehicles to existing roads and trails; (3) Allow no surface disturbance.



MAP C-4
CANON JARIDO

SURFACE OWNERSHIP

STATE □

BLM ▥

PRIVATE □

N ↑

PAVED OR GRADED ROAD —

PRIMITIVE ROAD OR TRAIL —

SMA BOUNDARY ▨

ALL MOTORIZED USE WITHIN BOUNDARY LIMITED TO EXISTING ROADS & TRAILS

5. JONES CANYON

General Description: Reconnaissance of the Jones Canyon prehistoric Pueblo II-III community (see Map C-5) has documented over 25 masonry sites, some over 100 rooms in size. The main site location is centrally located within the community and may contain 200 or more rooms. Early analysis suggests that this community may be Chacoan-related; however, it appears that it does not display some of the classic Chacoan ceramic and masonry attributes.

Vegetation of the area is typical of the dry, high (6800 to 7200') plateaus of north-central New Mexico. Dense juniper and pinyon are the dominant species, with scattered grasses, Gambel's oak, cliff rose, sage, squawberry, yucca, cholla, and ponderosa pine also present.

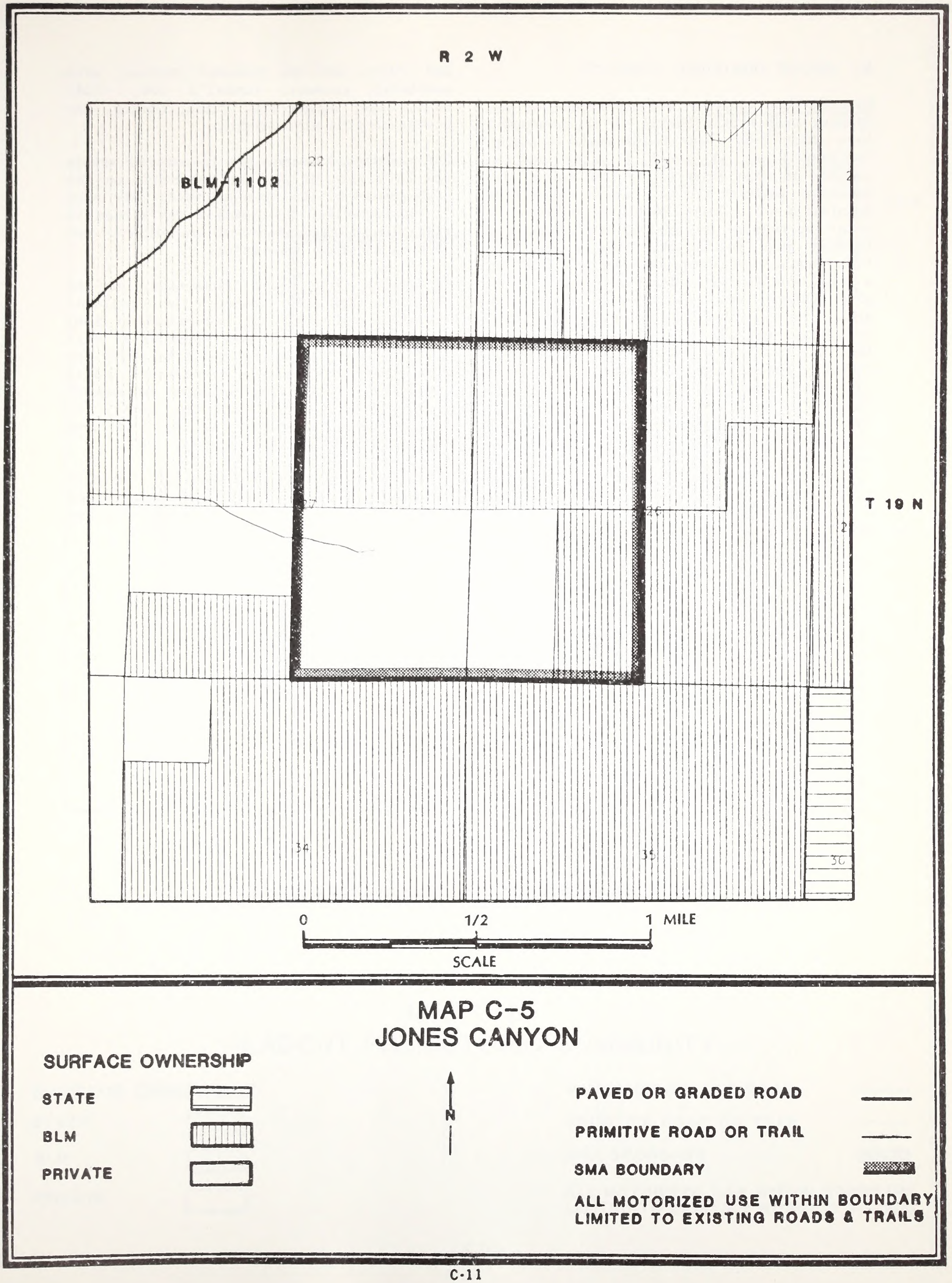
The prehistoric community is located at the head of Jones Canyon and along several tributary canyons in the area. The area is characterized by dramatic variations in elevation, sandstone outcroppings, stabilized sand dunes, and dense vegetation. Almost all local high ground contains sites or other evidence of prehistoric occupation.

The canyon just south of Jones Canyon is one of the few riparian zones in the northern portion of the Rio Puerco ES area. A perennial spring and stream feed a man-made pond in this canyon. This perennially moist environment supports a diversity of riparian vegetation. Gambel's oak grow 30 to 40 feet tall in the canyon. Although no surveys have been made, the canyon is surely a haven for a diversity of wildlife species.

Management Objectives: The management emphasis for the Jones Canyon SMA will be on cultural values, riparian habitat, scenic values, and intensive recreation use, specifically semi-primitive non-motorized recreation opportunities (see Appendix I).

Management of the Jones Canyon site and community under the cultural resource scientific and conservation goal category designations (see Appendix K) will allow further approved scientific study while maintaining existing conditions until completion of a comprehensive management plan sufficient in detail to assign use categories to all of the components within the community.

The planned actions include: (1) Develop an activity plan; (2) Allow no surface disturbance; (3) Acquire non-public lands; (4) Withdraw locatable minerals; (5) Limit motorized vehicle use to existing roads and trails; (6) Allow no surface occupancy (fluid minerals).



MAP C-5
JONES CANYON

6. HEADCUT PREHISTORIC COMMUNITY

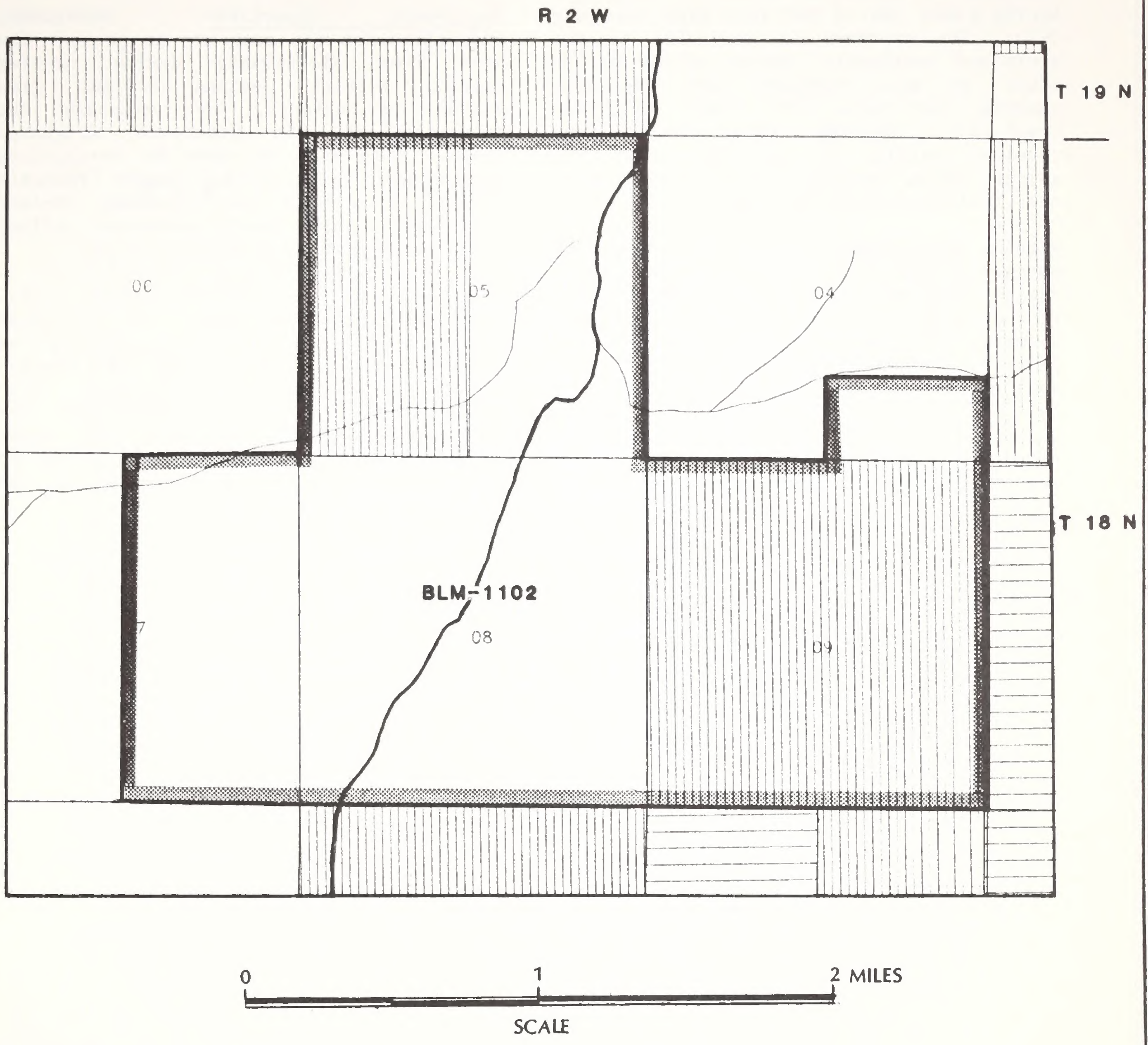
General Description: Reconnaissance of the Headcut prehistoric Pueblo II-III community (see Map C-6) has documented a large isolated kiva, at least 5 major pueblos ranging in size from 45 to 100 rooms, and numerous smaller sites. One concentration consisting of a large pueblo (150 rooms or more) surrounded by smaller structures is located just across the Headcut drainage from another concentration defined only as a high Pueblo site density area. Total site numbers for this Special Management Area could exceed 200 sites. The 1976 reconnaissance of this community suggests that it is classic Chacoan in nature and probably contemporary with the Jones Canyon community immediately to the north, but displaying different masonry and ceramics. The exact number, affiliation, and location of components within this community have not been established.

Vegetation of the area is typical of the dry, high (6700 to 7200') plateaus of north-central New Mexico. Dense juniper and pinyon are the dominant species, with scattered grasses, Gambel's oak, cliff rose, sage, squawberry, yucca, cholla, and ponderosa pine also present.

The prehistoric community is located within one half mile of Headcut reservoir on the high ground to the east and west. The area is characterized by dramatic variations in elevation, sandstone outcroppings, and pockets of dense vegetation.

Management Objectives: Management of the Headcut community under the cultural resource scientific and conservation goal category designations (see Appendix K) will allow further approved scientific study but will maintain existing conditions until completion of a comprehensive management plan which is sufficient in detail to assign use categories to all of the components within the community.

The planned actions include: (1) Develop an activity plan; (2) Limit motorized vehicle use to existing roads and trails; (3) Acquire non-public lands.



MAP C-6
HEADCUT PREHISTORIC COMMUNITY

SURFACE OWNERSHIP

- STATE ▭
- BLM ▥
- PRIVATE ▭

N ↑

- PAVED OR GRADED ROAD ——
- PRIMITIVE ROAD OR TRAIL ——
- SMA BOUNDARY ▨

ALL MOTORIZED USE WITHIN BOUNDARY
LIMITED TO EXISTING ROADS & TRAILS

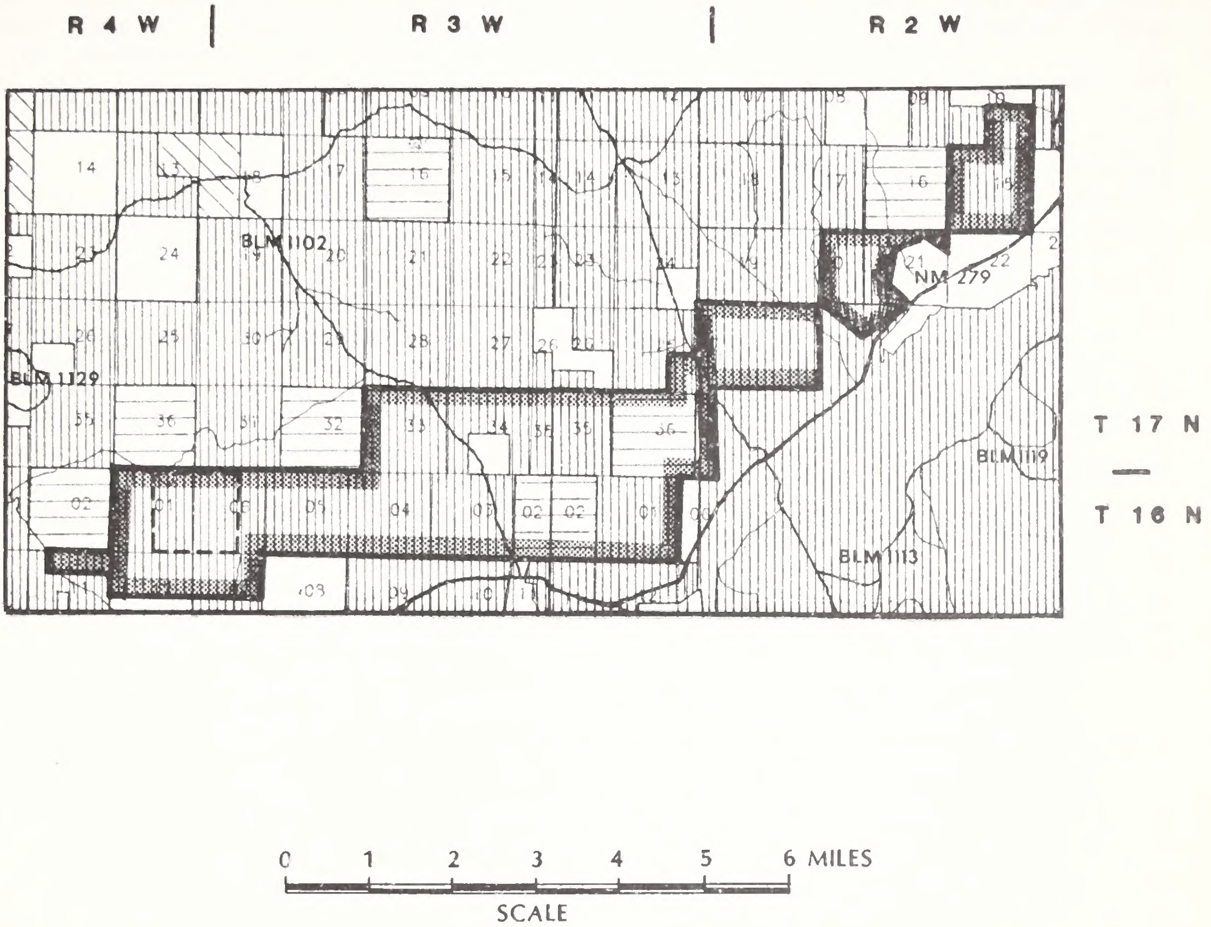
7. SAN LUIS MESA RAPTOR AREA

General Description: San Luis Mesa consists of about 20 miles of sandstone bluffs about 100 to 200 feet high (see Map C-7). The exposure is generally to the south and southeast. Ledges carved in the bluff by wind erosion form excellent nesting substrate for birds of prey (raptors). Species which have been recorded nesting at San Luis Mesa are golden eagle, prairie falcon, great-horned owl, redtailed hawk, and raven.

Within the area proposed for special management is the Empedrado Watershed Study Area. This watershed is part of the Rio Puerco Hydrology Study which monitors hydrologic responses to the Rio Puerco grazing management programs. Only through such monitoring can a determination be made as to whether the objectives of the Rio Puerco Grazing ES (USDI, BLM 1978b) are being met. The western half of the SMA is part of the La Lena Wilderness Study Area, currently being managed under the Interim Management Policy and Guidelines for Lands Under Wilderness Review (USDI, BLM 1979b).

Management Objectives: Management objectives for the area are to protect the area from disturbance during nesting season, protect nesting habitat from surface disturbance, and maintain the integrity of the Empedrado Watershed Study. This will be done by restricting disturbance during nesting season (February 1-July 1) and by not allowing surface disturbance which would adversely affect the area as nesting habitat.

The planned actions include: (1) Designate as an Area of Critical Environmental Concern; (2) Develop an activity plan; (3) Allow no surface disturbance February 1 to July 1; (4) Allow no surface disturbance in the Empedrado Watershed Study Area; (5) Limit motorized vehicle use to existing roads and trails; (6) Withdraw minerals in the watershed area.



MAP C-7
SAN LUIS MESA RAPTOR AREA

SURFACE OWNERSHIP

STATE ▤

BLM ▥

PRIVATE ☐

PAVED OR GRADED ROAD ——

PRIMITIVE ROAD OR TRAIL ——

SMA BOUNDARY ▩

EMPEDRADO WATERSHED ----

ALL MOTORIZED USE WITHIN BOUNDARY LIMITED TO EXISTING ROADS & TRAILS

8. AZABACHE STATION

General Description: The so-called Azabache Stage Station is an abandoned, four room, sandstone masonry ranch house with spring house, corral, and evidence of at least two other buildings built near the base of Mesa La Azabache, next to a small spring known as "Ojo Azabache" (see Map C-8). The ruin is located along the old Santa Fe-Fort Wingate wagon road and even older Zuni-Jemez trail about fifteen miles west of Cabezon.

The ruin is important because little is known about rural architecture in New Mexico, and because it is so well preserved. The ruins have been stripped of removable objects but the cultural deposits remain intact except for natural deterioration. There is some evidence that vandalism to the site may be increasing. The house was built and occupied during the late territorial period of New Mexico's history (1846-1880), homesteaded following World War I, and was abandoned about 1925.

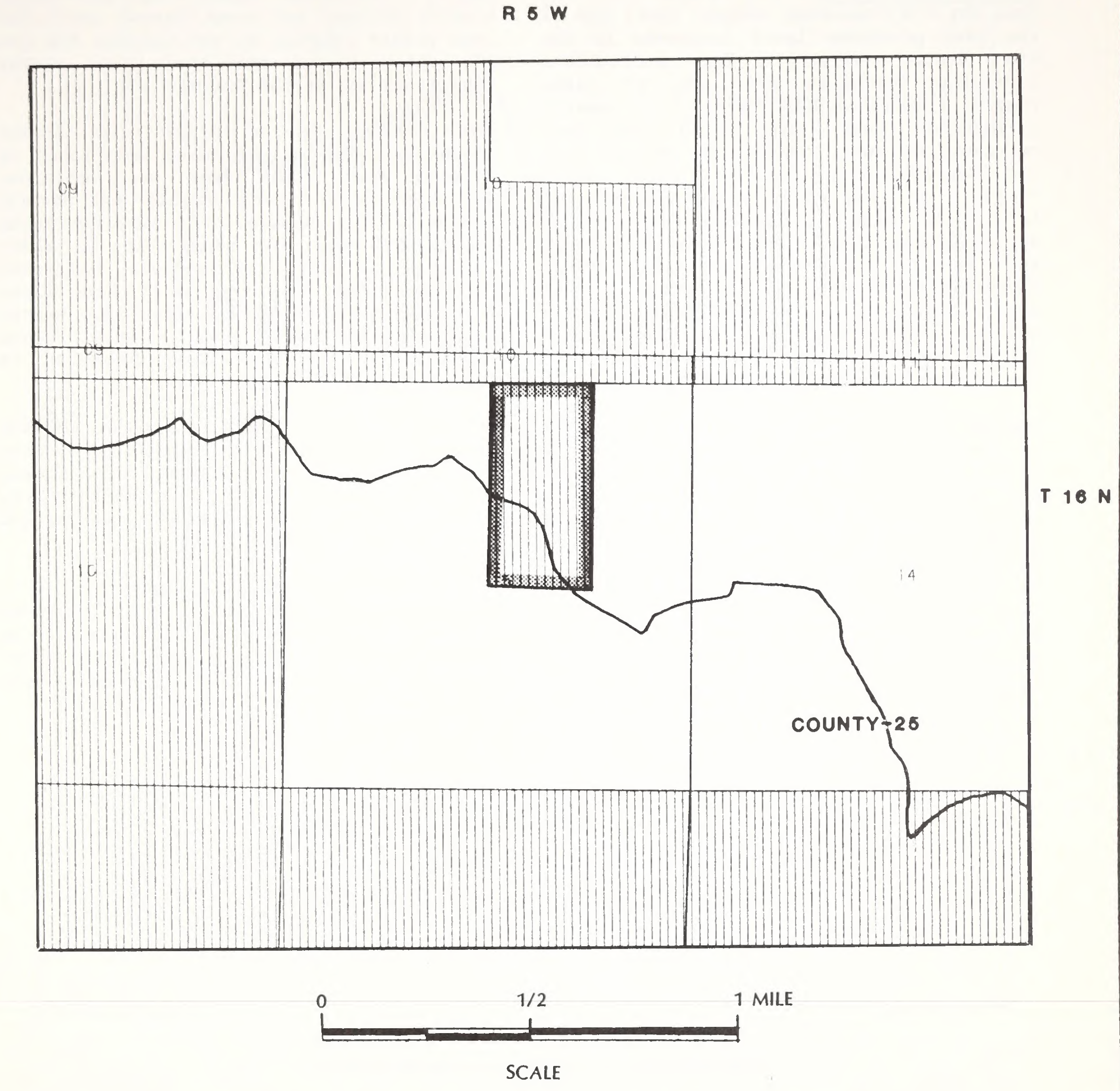
The origin of the term "Azabache Stage Station" is unknown. The Star Line Mail stage stopped at Willow Springs and Cabezon to the west and east of Azabache, with no stops along the way. Maps from 1879 and 1883 indicate a stop at Coal Spring, apparently located at the ruin one mile northeast of "Azabache Station." Since Azabache means "a compact velvet-black coal," it is likely that the place called Azabache by Bandelier in 1888 and the ranch shown as Coal Spring on the 1883 USGS topographic map are one and the same.

John Walker, U.S. Deputy Surveyor, who surveyed the area in 1901, reported that there were only four inhabited ranches in the area, the house at Ojo Azabache, the house a mile northeast of Azabache (the old Coal Spring), and two other ranches a little further east. Federal records show the ranch was homesteaded by Eduardo Montoya from 1916 to 1925. The house has had no known occupants since 1925.

The house at Ojo Azabache could yield important information about frontier life during New Mexico's territorial period.

Management Objectives: Management of the Azabache Station site and community under the cultural resource scientific goal category designation (see Appendix K) will allow further approved scientific study while maintaining existing conditions until completion of a comprehensive management plan. Management of the SMA will emphasize interpretive and educational values.

The planned actions include: (1) Develop an activity plan; (2) Allow no surface occupancy (fluid minerals); (3) Withdraw locatable and saleable minerals; (4) Close the area to motorized vehicle use.



MAP C-8
AZABACHE STATION

SURFACE OWNERSHIP

BLM ▥

PRIVATE ☐

N

PAVED OR GRADED ROAD —

PRIMITIVE ROAD OR TRAIL ┈

SMA BOUNDARY ▩

SMA CLOSED TO MOTORIZED VEHICLE USE, EXCLUDING COUNTY ROAD 25

9. CABEZON PEAK

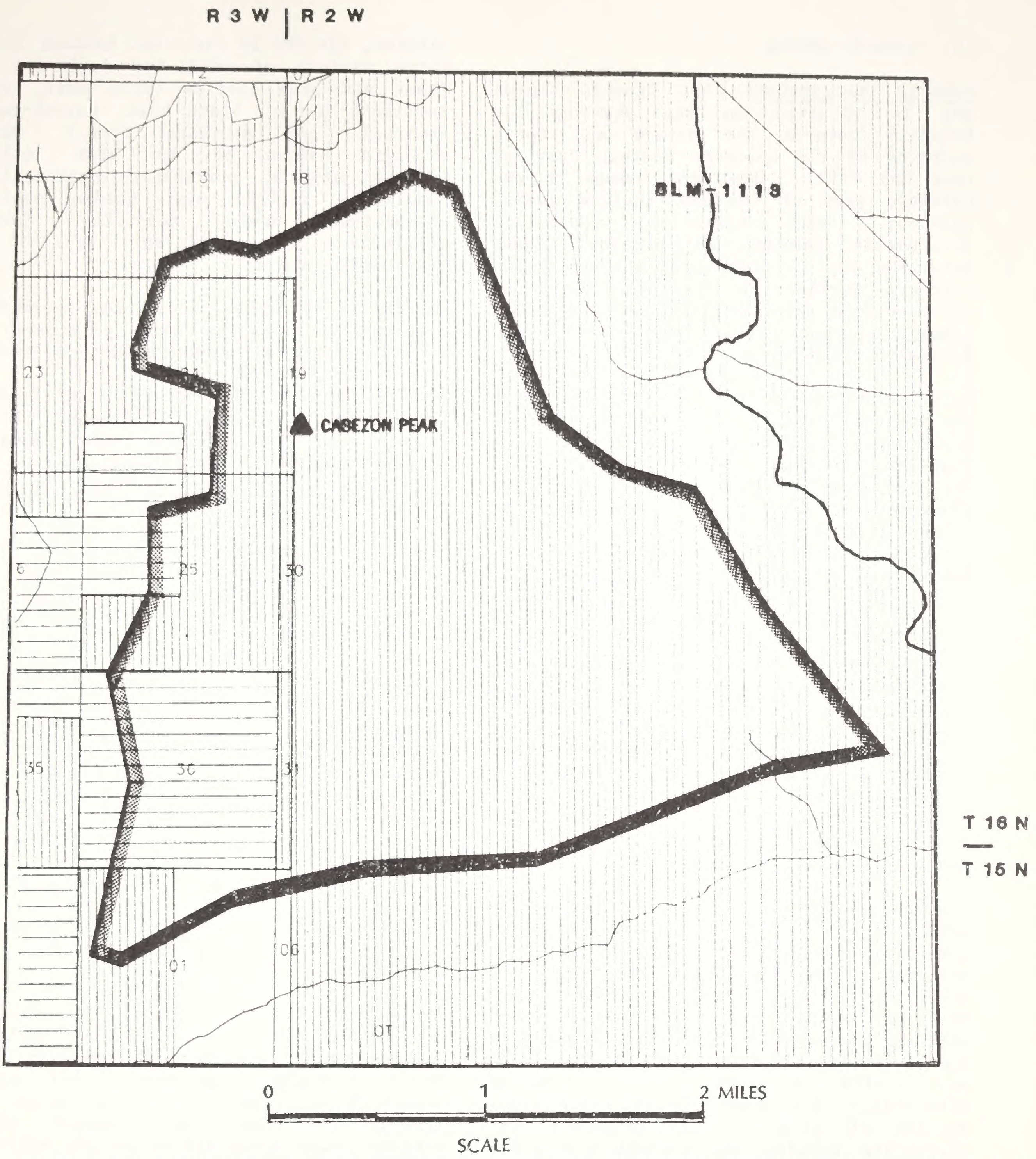
General Description: The Cabezon Peak SMA (see Map C-9) contains Cabezon Peak, one of the most prominent local landmarks in the Rio Puerco Valley. The surrounding low-lying foothills give way to large rugged shoulders that support a nearly cylindrical neck from which the peak receives its name. Cabezon is derived from the Spanish noun "cabeza" which means "head." In this case, Cabezon translates into "big head." Cabezon Peak towers approximately 8,000 feet above sea level and is surrounded by rolling grassy foothills and steep-sided arroyos. The Peak itself is part of the Mt. Taylor volcanic region and is the largest of several volcanic necks protruding from the floor of the Rio Puerco Valley.

Vegetation of the SMA is confined primarily to the rolling foothills, and consists of cactus, shrubs, grasses, and some pinyon and juniper. Cabezon Peak is currently being managed under Interim Management Policy and Guidelines for Lands Under Wilderness Review (USDI, BLM 1979b). It is a popular recreation site for casual visitation and for climbing. Over two hundred climbers from in- and out-of-State, as well as two foreign countries, signed the visitor register in a twelve month time span. The area also contains two rare cactus species and raptor nesting sites. The raptors using the area are golden eagle, red-tailed hawk, sparrow hawk, prairie falcon, and great horned owl. The rare plants growing in the Cabezon SMA are pincushion cactus and blue grama cactus (see Table 3-3 in the Draft).

The remains of a prehistoric shrine (possibly still in use) have been found on Cabezon Peak. The Peak has religious significance for both Pueblo and Navajo Indians. The Navajo have various myths associated with the peak, one of which explains the origin of Cabezon. According to legend the peak and local lava flows came from a giant who was slain upon nearby Mount Taylor. The giant's head became Cabezon Peak and his blood congealed to form the malpais.

Management Objectives: Management of the Cabezon Peak SMA will emphasize scenic values, socio-cultural values, rare cactus, and intensive recreation use, specifically semi-primitive non-motorized recreation opportunity (see Appendix I).

The planned actions include: (1) Designate as an Area of Critical Environmental Concern; (2) Develop an activity plan; (3) Acquire non-public lands; (4) Allow no surface disturbance; (5) Close to motorized vehicle use.



MAP C-9
CABEZON PEAK

SURFACE OWNERSHIP

STATE	▤
BLM	▥
PRIVATE	☐

N

PAVED OR GRADED ROAD	—
PRIMITIVE ROAD OR TRAIL	—
SMA BOUNDARY	▓

SMA CLOSED TO MOTORIZED VEHICLE USE

10. IGNACIO CHAVEZ

General Description: The Ignacio Chavez SMA is situated on the physiographic boundary between the Navajo and Datil sections of the Colorado Plateau Province (see Map C-10). Landforms common to the northern part of the SMA include mesas, cuestas, rock terraces, retreating escarpments, canyons, and arroyos. These landforms are in striking contrast to the southern portion of the SMA, which is characterized by basalt plains, cinder cones, exhumed plugs and dikes, and extensive talus slopes.

Relief varies throughout the SMA from low-relief mesa tops to high-relief escarpments along plateau edges. The highest elevation is approximately 7,731 feet at Bear's Mouth, while the lowest elevation, approximately 6,000 feet, is found near the Arroyo Chico drainage. Three principal landforms occur within the boundaries of the Ignacio Chavez SMA. These include: (1) the lava-covered surface of El Banquito Mesa, (2) the talus-covered slopes along the mesa edge, and (3) the incised cuesta topography that characterizes the remainder of the area. The blending of these three landforms creates a highly valued visual resource, with significant contrast in form, line, texture, and color evident.

Vegetation includes pinyon-juniper and ponderosa pine, scattered Douglas fir, prairie grasses, and cactus.

The Ignacio Chavez SMA is within one of the most diverse and productive wildlife habitat areas on BLM-administered lands in northwest New Mexico. The mix of pinyon-juniper woodland, ponderosa pine with oak understory, and open grassland parks in the Ignacio Chavez SMA, along with the protection afforded by the steep slopes and cliffs of Mesa Chivato, provide potentially excellent habitat for many species of wildlife. Approximately 257 vertebrate species may inhabit the area, including 146 species of birds, 71 of mammals, 31 of reptiles, and 9 species of amphibians. Although use of the area by threatened or endangered species is limited, the SMA is important habitat for a large variety of wildlife, including at least six game species (mule deer, elk, Merriam's turkey, black bear, tassel-eared squirrel, and mourning dove.) Other wildlife common to the area include coyotes, badgers, porcupines, cottontails, Gunnison's prairie dog, golden eagles, sharpshinned hawks, red-tailed hawks, Stellar's jays, pinyon jays, and gray-headed juncos.

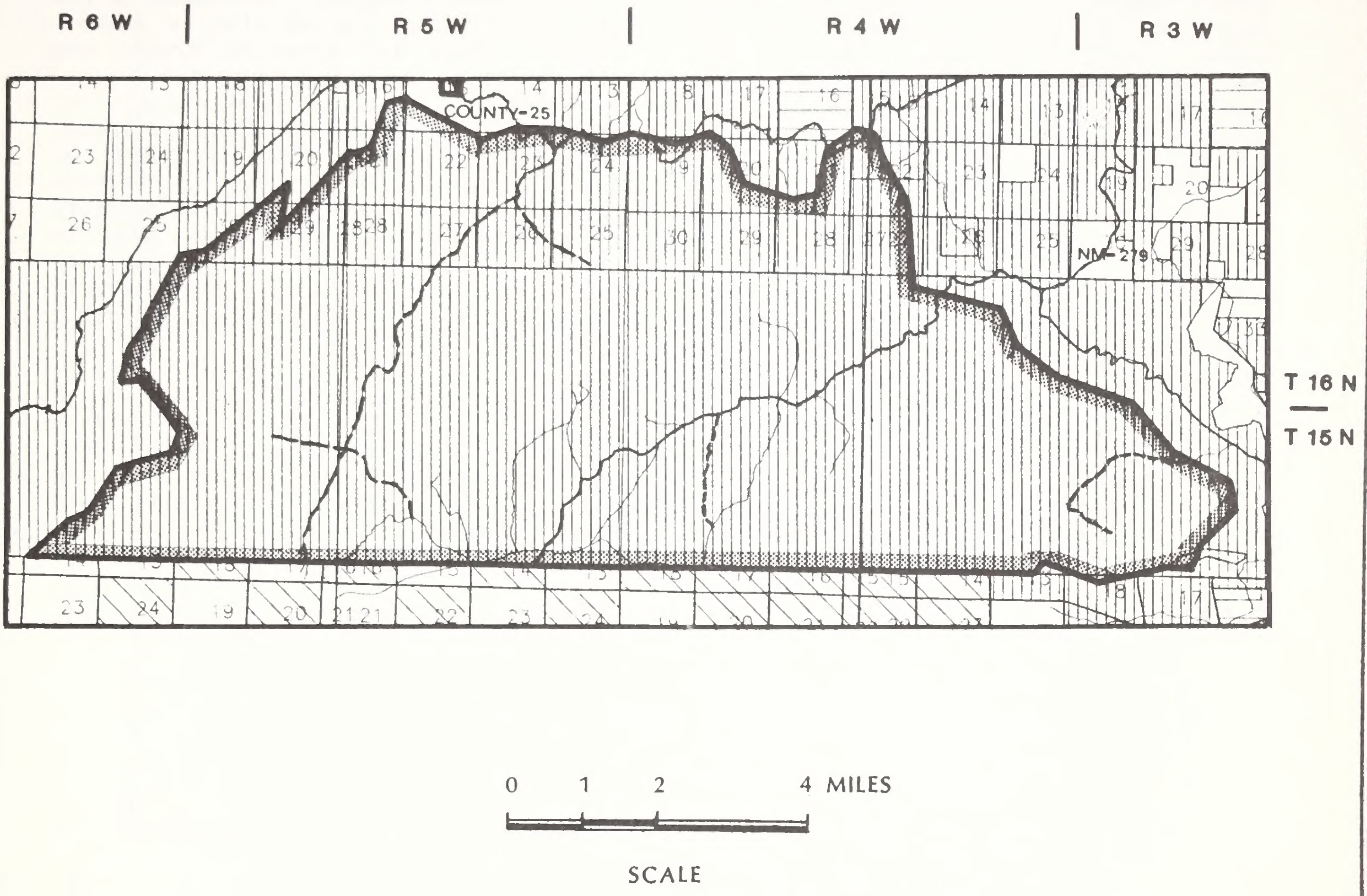
The SMA is currently popular for recreation opportunities ranging from primitive to roaded natural (see Appendix 1).

Ignacio Chavez SMA contains the Ignacio Chavez and Chamisa Wilderness Study Areas, and is currently being managed under the Interim Management Policy and Guidelines for Lands Under Wilderness Review (USDI, BLM 1979b).

The Ignacio Chavez SMA contains 17,300 acres of accessible fuelwood, and has traditionally sustained small scale cutting, predominantly for home fuelwood use.

Management Objectives: Management of the Ignacio Chavez SMA will emphasize maintenance of the current wildlife habitat diversity and environmental education potential by maintaining the current mix of three representative ecosystems. The Ignacio Chavez SMA will also be managed to maintain visual values and intensive recreation values, including 23,587 acres of primitive, 8,800 acres of semi-primitive non-motorized, 3,696 acres of semi-primitive motorized, and 7,065 acres of roaded-natural recreation opportunity (see Appendix 1).

The planned actions include: (1) Develop an activity plan; (2) Allow fuelwood cutting to improve wildlife habitat; (3) Allow no surface disturbance; (4) Limit motorized vehicles to existing roads and trails, (5) Determine standard fluid mineral lease stipulations during activity planning; (6) Close certain routes (except for authorized users)(see Map C-10); (7) Acquire non-public lands.



MAP C-10
IGNACIO CHAVEZ

SURFACE OWNERSHIP

STATE	▭
BLM	▥
PRIVATE	▭
USFS	▨

N ↑

PRIMITIVE ROAD OR TRAIL	——
PAVED OR GRADED ROAD	——
SMA BOUNDARY	▩
LIMITED TO AUTHORIZED USER	— —
ROUTE IS PROPOSED CLOSED TO VEHICULAR USE	- - - - -

REMAINING VEHICULAR USE IS PROPOSED LIMITED TO EXISTING ROADS & TRAILS

11. BIG BEAD MESA

General Description: Big Bead Mesa, a well-known historic Navajo locality, is currently designated as a National Historic Landmark. The original designation consisted of 750 acres; however, after examination of the site in 1975 by the National Park Service, it was reduced to 150 acres in 1981. The Big Bead Mesa SMA (see Map C-11) is located on the top of a cresent-shaped mesa that rises 150 to 200 feet above the surrounding floor of the Rio Salado drainage. The mesa, canyon walls, and much of the surrounding terrain consists of Dalton sandstone and Mancos shale, the latter of which contains high concentrations of fossil bivalves and univalves which give the mesa its Navajo name of Yotso or "Big Bead."

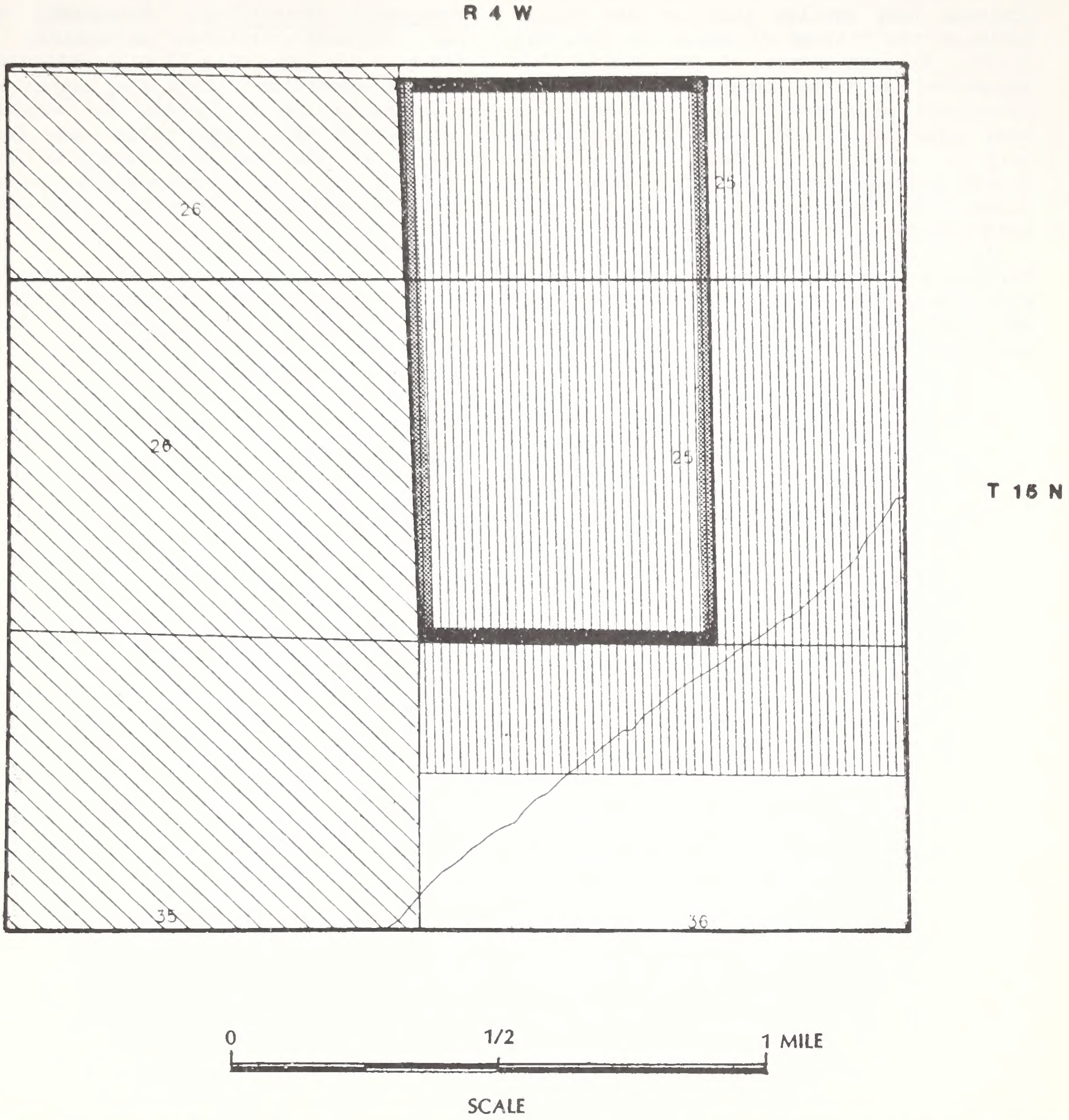
The cultural resource property consists of over 90 sites and features dating from about 1745 to 1812 AD located in several clusters. The most impressive architectural feature is a defensive masonry wall 12 feet high and 26 feet wide that completely separates the major site cluster from the rest of the mesa top.

Vegetation of the area is typical of the dry, high (6400 to 6600 foot elevation) plateaus of New Mexico. Juniper and pinyon comprise the dominant ground cover with some scrub oak, cliff rose, squawberry, yucca, cholla, and an occasional ponderosa pine occurring.

Most of the cultural remains were completely excavated by Dorothy Keur in 1939 (Keur 1941). While Big Bead Mesa is very well known in the anthropological literature as an early Navajo site, current public visitation is extremely low because of its remote location. Consequently the only deterioration at the site is weather induced. There are areas of cracks and weakness within the defensive wall.

Management Objectives: This cultural resource property and vicinity will be managed under the cultural resource scientific and socio-cultural goal category designations (see Appendix K) in order to maintain the current condition of the site until completion of a comprehensive cultural resource management (activity) plan.

Planned Actions include: (1) Develop an activity plan; (2) Allow no surface occupancy (fluid minerals); (3) Limit motorized vehicle use to existing roads and trails; (4) Withdraw locatable and saleable minerals.



MAP C-11
BIG BEAD MESA

SURFACE OWNERSHIP

BLM	▥
USFS	▧
PRIVATE	☐

↑ N

PRIMITIVE ROAD OR TRAIL	—
SMA BOUNDARY	▩

ALL MOTORIZED USE WITHIN
BOUNDARY LIMITED TO
EXISTING ROADS & TRAILS

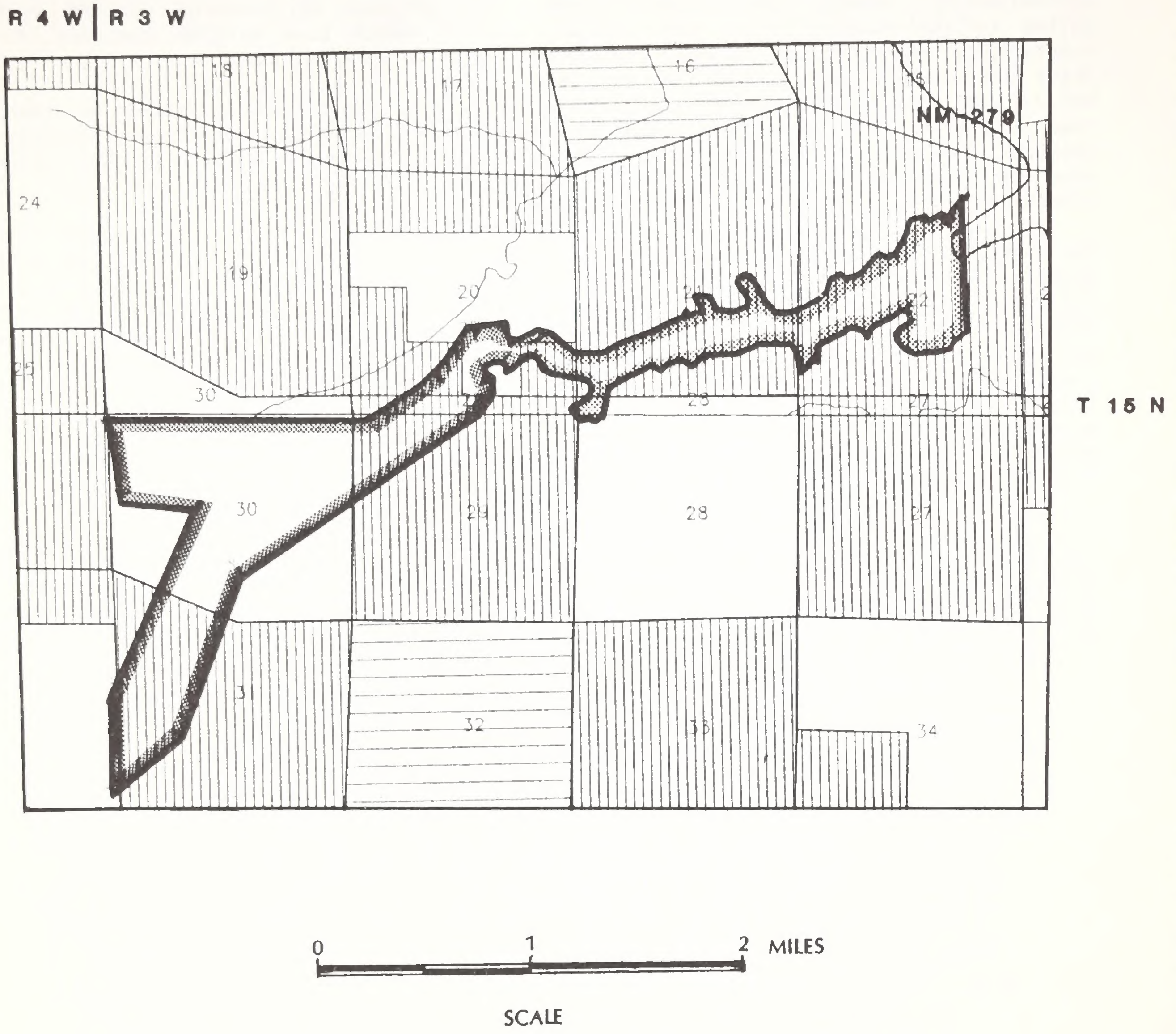
12. CANON TAPIA

General Description: The Canon Tapia SMA is located within a large secondary drainage that empties into the Rio Puerco south of the Village of Guadalupe (see Map C-12). Reconnaissance of the canyon has documented a large number of previously unrecorded prehistoric rock art sites in both large panels and individual glyphs as well as other site types. Juniper and pinyon are the dominant species along the canyon rim, with pinyon, juniper, and salt cedar dominant within the canyon itself.

The canyon provides the occasional visitor with spectacular views of contrasting red and brown sandstone cliffs, a large natural sandstone bridge, prehistoric petroglyphs reflecting a wide range of time, as well as remains of Navajo masonry sites, hogans, and storage structures.

Management Objectives: Management under the cultural resource scientific goal category (see Appendix K) will maintain the present condition within the canyon while allowing public visitation and enjoyment. Because of the high value and fragile nature of the cultural resources within this canyon a comprehensive cultural resource management (activity) plan will be developed.

Planned actions include: (1) Designate as an Area of Critical Environmental Concern; (2) Develop an activity plan; (3) Acquire non-public lands; (4) Allow no surface occupancy (fluid minerals).



MAP C-12
CANON TAPIA

SURFACE OWNERSHIP

STATE ▤

BLM ▥

PRIVATE ☐

N

PAVED AND GRADED ROADS ——

PRIMITIVE ROADS AND TRAILS ——

SMA BOUNDARY ▩

13. GUADALUPE RUIN AND COMMUNITY

General Description: The Guadalupe SMA (see Map C-13) contains Guadalupe Ruin, a prehistoric Chacoan outlier of about forty-five rooms (of which about one-half have been excavated and stabilized), and approximately twenty additional sites dating to the Pueblo II-III time period. Substantial numbers of related masonry sites are located just outside of the SMA and include recently discovered prehistoric road segments and related features. A cultural resource survey of the general area of Guadalupe Ruin has recorded 157 related sites.

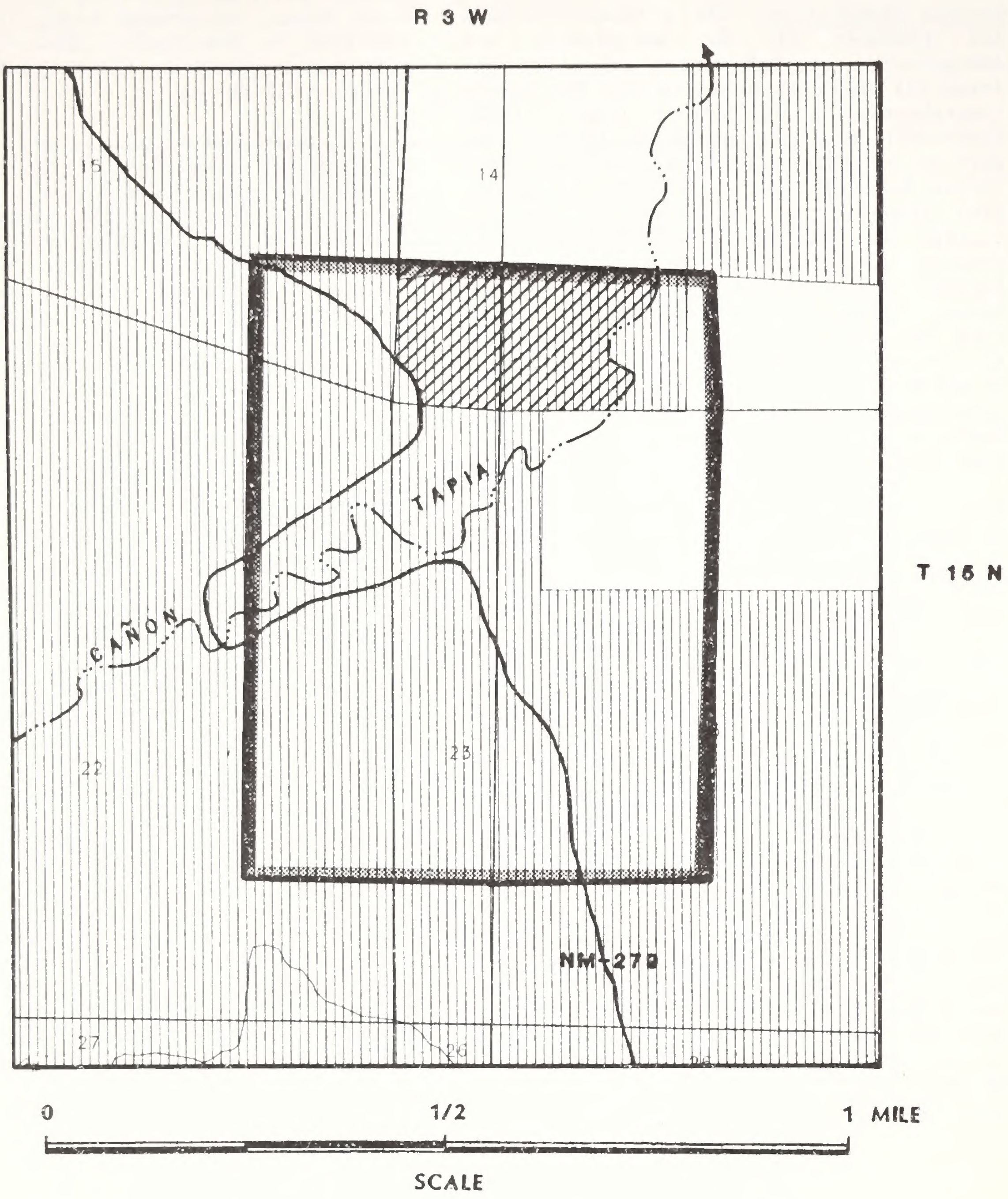
The central ruin itself has been managed since 1981 under an approved cultural resources management plan (USDI, BLM 1981a). The plan includes stabilization and recording measures, now complete, and established patrol and monitoring actions, still in effect. The Guadalupe SMA encompasses the area covered by the existing plan and will incorporate the existing management plan into this planning effort.

The central ruin and community lie on the western edge of the Rio Puerco Valley immediately below the confluence of the Arroyo Chico and the Rio Puerco. The surrounding highland areas include the Cebolleta Mountains to the west and Mesa Prieta to the east, both eroded remnants of an extensive basalt plateau. Several tributary arroyos enter the Rio Puerco floodplain near Guadalupe Ruin from steep-sided canyons. The topography is7dominated by numerous exhumed volcanic plugs which rise several hundreds of feet above the valley floor.

Dominant vegetation is cactus, grasses, and shrubs with an occasional juniper in floodplain areas and heavy pinyon/juniper in locally higher elevations.

Management Objectives: Management of this SMA will incorporate the existing cultural resource management plan for the main ruin and extend cultural resource conservation and scientific goal category management considerations (see Appendix K) to the surrounding community. This will allow maintenance of present conditions while providing public visitation and a more comprehensive management approach to a high value, high density cultural resource area.

Planned actions include: (1) Develop an activity plan; (2) Close the 40 acre fenced area to motorized vehicle use; (3) Limit motorized vehicle use in the remainder of the area to existing roads and trails; (4) Withdraw minerals.



MAP C-13
GUADALUPE RUIN AND COMMUNITY

SURFACE OWNERSHIP

BLM	▥
PRIVATE	☐

N

PAVED OR GRADED ROAD	▬
PRIMITIVE ROAD OR TRAIL	―
SMA BOUNDARY	▓
CULTURAL RESOURCE MANAGEMENT PLAN AREA - CLOSED TO ALL VEHICULAR USE	▨

ALL MOTORIZED USE WITHIN REMAINING AREA LIMITED TO EXISTING ROADS & TRAILS

14. ELK SPRINGS

General Description: The western foothills and piedmont of the Nacimientos was designated a crucial winter range for the Jemez elk and deer herds in the New Mexico Comprehensive Wildlife Plan (N.M. Department of Game and Fish 1980). The portion of this area north of the Jemez Indian Reservation is predominantly public land proposed for management as the Elk Springs SMA (see Map C-14). Chaining and seeding projects have been completed to improve winter forage for big game on BLM lands. Lands in the crucial winter range from San Miguel to Cuba are predominantly in private ownership. The New Mexico Department of Game & Fish has received a considerable number of complaints from landowners in this area about wintering big game depredations.

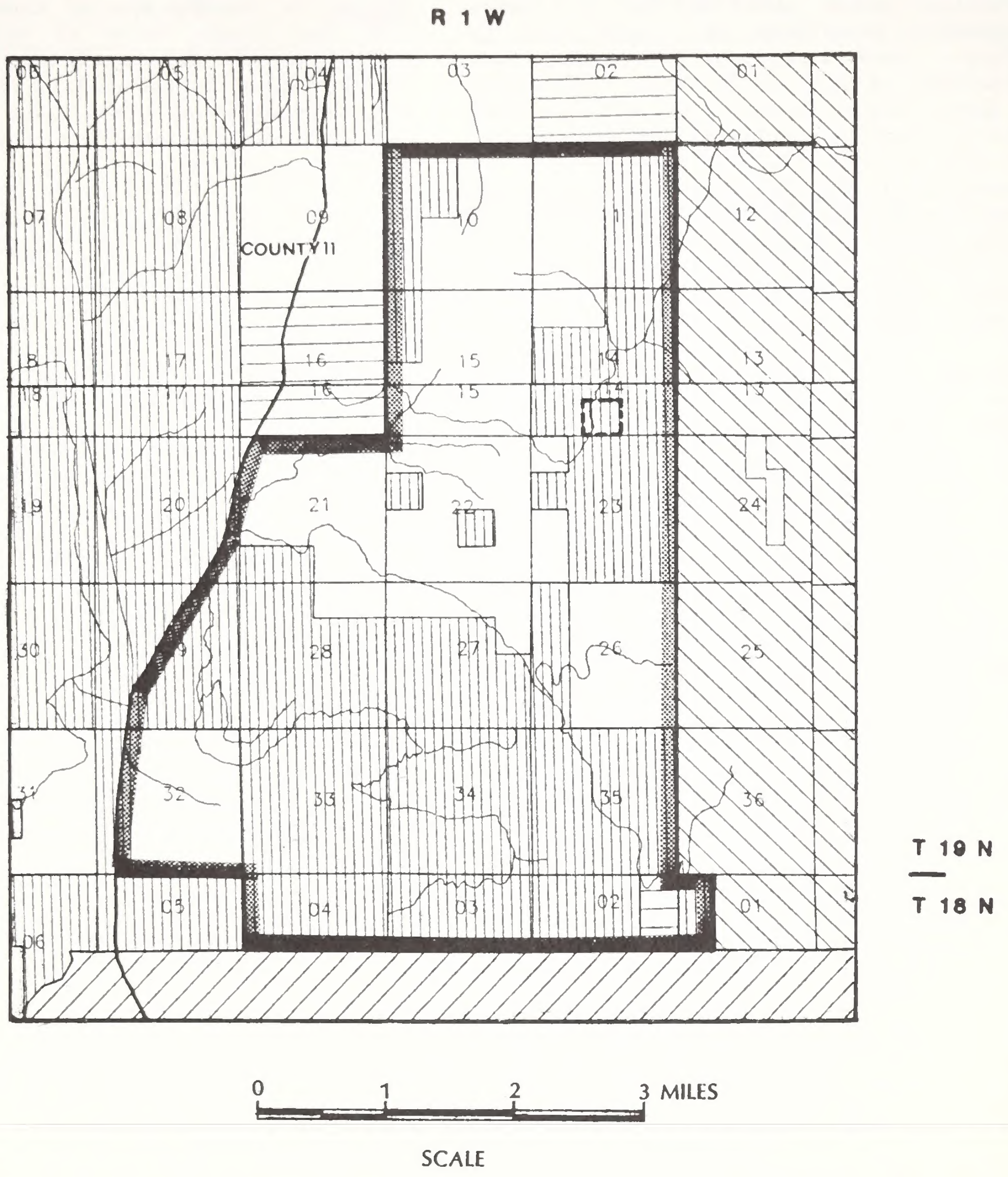
Also within this SMA is an area identified by Dane, Cobban, and Kauffman (1966) as the San Juan Basin Reference Section for the Juana Lopez Member of the Mancos Formation. Fossils include ammonites, molluscs, and fish debris of Upper Cretaceous age (about 70 million years before present). The stratigraphy and regional relationships of this reference section were analyzed and published by the United States Geological Survey (Dane, Cobban, and Kauffman 1966).

The reference section lies on a small north-trending hogback. The actual section measured by Dane and others lies in a gap in the hogback. At the place of measurement, the hogback is held up by the resistant limestones of the Juana Lopez Member. The Mancos Shale which lies above and below the Juana Lopez is not eroded from the hogback immediately to the north of the measured section and thus the area of good exposures extends only about 400 feet along strike in a northerly direction (San Filipo 1985). To the south lies another small knoll held up by well exposed Juana Lopez, continuing along strike about 275 feet to the south. Thus the area of good rock exposure is about 675 feet by 140 feet, or 2.2 acres.

A reference section of this type is important from a paleontological perspective and represents a unique resource. This exposure serves as a standard for correlation of the Juana Lopez Member throughout its area of deposition and provides a standard for paleontological correlation worldwide. Because this locale is highly significant and has been used for the scientific study of Upper Cretaceous New Mexico faunal assemblages, the area should be preserved without change for future reference and study.

Management Objectives: The goals of the Elk Springs SMA are to provide quality winter range for Jemez elk and deer herds by providing optimal cover and forage, thus alleviating big game depredations on private lands. In addition, the SMA would be managed to protect the Juana Lopez Member reference section, and scenic and recreational values, specifically semi-primitive motorized opportunities.

Planned actions include: (1) Designate as an Area of Critical Environmental Concern; (2) Develop an activity plan; (3) Acquire non-public lands; (4) Allow no surface disturbance associated with fluid mineral development Nov. 16 to May 14; (5) Limit motorized vehicles to existing roads and trails; (6) Close to motorized vehicle use Nov. 16 to May 14; (7) Designate the Juana Lopez Member reference section as a Research Natural Area; (8) Allow no surface disturbance in the Research Natural Area; (9) Withdraw minerals in the Research Natural Area.



MAP C-14
ELK SPRINGS

SURFACE OWNERSHIP

STATE	▭
BLM	▥
PRIVATE	▭
INDIAN	▨
USFS	▧

N ↑

PAVED OR GRADED ROAD	——
PRIMITIVE ROAD OR TRAIL	——
SMA BOUNDARY	▒
JUANA LOPEZ MEMBER	-----

ALL MOTORIZED USE WITHIN BOUNDARY LIMITED TO EXISTING ROADS & TRAILS AND SUBJECT TO SEASONAL RESTRICTIONS

15. TENT ROCKS

General Description: The northeast portion of the Tent Rocks SMA (see Map C-15) exhibits the unique volcanic tuft formations which give the SMA its name. Comparable formations are found only in Turkey. These formations are steep, cone formations as tall as 90 feet. Coloration is grey, black, white, and subtle pastel shades. Immediately below the "tent rocks" are more rounded "badland" topography. The remainder of the Tent Rocks SMA consists predominantly of low rolling hills of pinyon-juniper cover with some ponderosa pine cover. The western portion exhibits several small canyons meandering down from mountain breaks terrain.

Although the Tent Rocks SMA has received no other official designations to date, it is a popular regional recreation site and has received consistent public and private attention over the past two decades. Hiking, sightseeing, camping, picnicking, and photography are some of the most popular activities in the SMA.

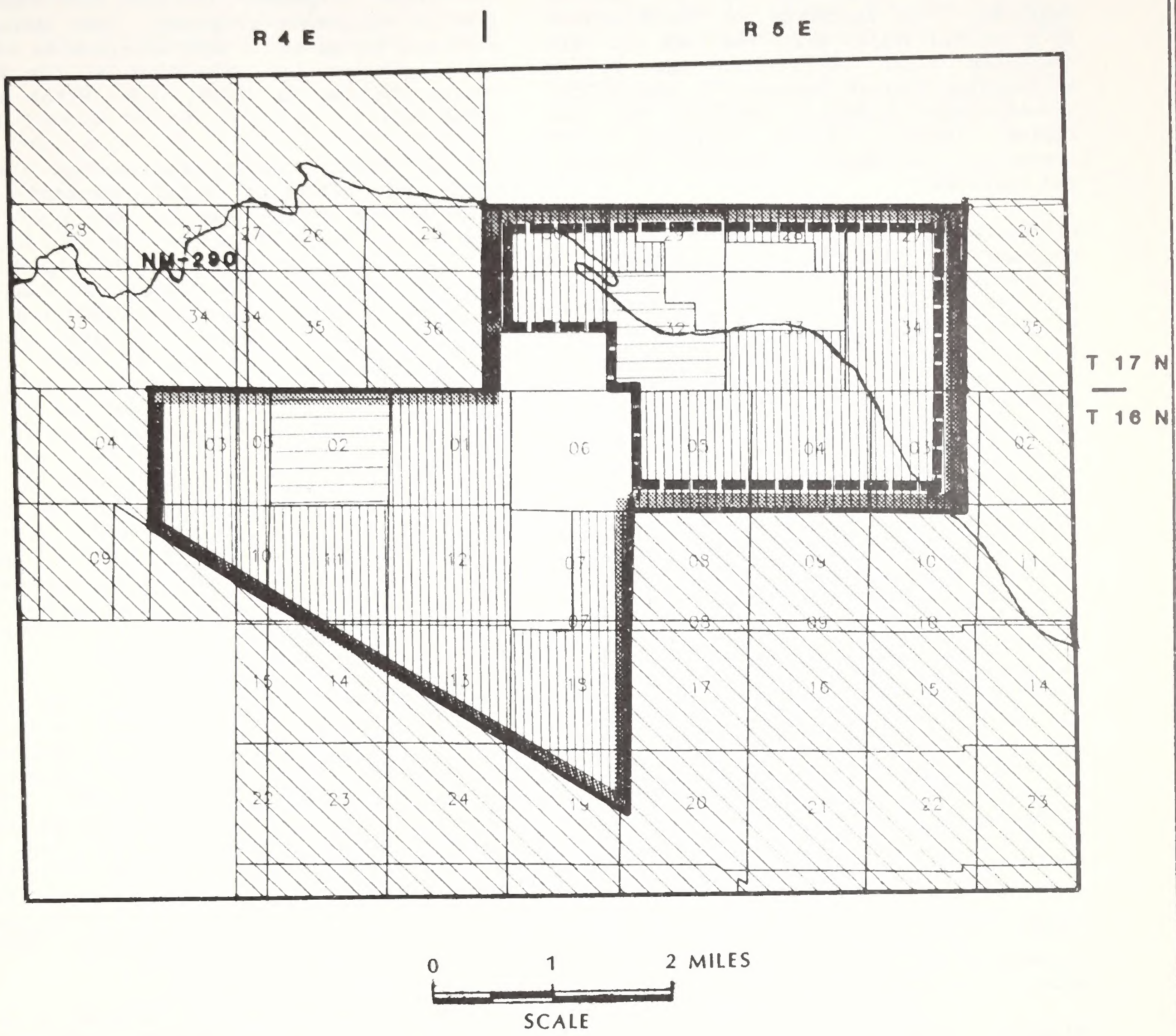
Existing data suggest that a full array of cultural resources exists in the Tent Rocks area. These resources range from early prehistoric to historic and include areas with socio-cultural values. The most common cultural resources are attributable to prehistoric Pueblo, modern Pueblo, and historic Hispanic use of the area. Site density is projected to be thirty to eighty sites per section.

The area has a wide plant diversity, including ponderosa pine, Apache plume, manzanita, blue grama, and side oats grama. The area contains a rather large and viable population of Arctostaphalus pungens, a shrubby species known primarily from the Sierra Madre of Mexico. This population site is one of the northernmost in the United States and it represents a unique genotype of this taxon adapted to the cooler moister weather of northern New Mexico.

Management Objectives: A portion of the Tent Rocks SMA will be designated as an Area of Critical Environmental Concern with management emphasis on the interpretation of geologic and scenic values, and on intensive recreation use, specifically semi-primitive non-motorized recreation opportunity (see Appendix 1).

The remainder of the SMA will be managed to protect habitat for non-game birds and to improve big game winter range. Agreements with adjacent landowners will be pursued and water will be developed to rehabilitate grassland parks.

Planned actions include: (1) Designate a portion as an Area of Critical Environmental Concern; (2) Develop an activity plan; (3) Develop Cooperative Management Agreements with private landowners; (4) Limit motorized vehicle use to existing roads and trails; (5) Allow no surface disturbance; (6) Develop water and rehabilitate grassland parks.



MAP C-15
TENT ROCKS

SURFACE OWNERSHIP

STATE ☐

BLM ▥

PRIVATE ☐

INDIAN ▧

N

PAVED OR GRADED ROAD —

SMA BOUNDARY ▓

AREA OF CRITICAL ENVIRONMENTAL CONCERN ▬ ▬ ▬

ALL MOTORIZED USE WITHIN BOUNDARY LIMITED TO EXISTING ROADS & TRAILS

16. OJITO

General Description: Overall, the Ojito SMA (see Map C-16) has a particularly high density and wide variety of special features. The landscape is characterized by a central valley which has been cut into red-brown rocks of Permian age and a surrounding rimrock composed of gray-white, Jurassic-aged gypsum. Landforms in this region include mesas, cuestas, rock terraces, escarpments, canyons, arroyos, and badlands.

Geologically, the San Ysidro Anticline contained in the Ojito SMA represents a classical example of a breached, plunging anticline. Aside from its obvious scenic qualities, the area is used extensively by the University of New Mexico and Bowling Green University of Ohio for introductory classes in geological mapping. The opportunity for scientific study provided by this feature is unique to the area and represents one of the few locations in the Southwest where these types of geological relationships are exposed.

Two plant species occur in the SMA that are on the State of New Mexico Heritage list of species of concern (see Table 3-3). These species include Abronia bigelovii (Bigelow verbena, a wildflower) which was considered by Knight (1982) to be an endangered taxon in New Mexico. The second species is Pediocactus papyracanthus (blue grama cactus), found in the northeast portion of the SMA. This cactus is found growing in clumps of blue grama and black grama grass in swales, and is currently a formal candidate for listing by the Federal government as threatened. Others include Selinocarpus lanceolatus (moonpod, a wildflower), and Erigeron pulcherrimus (fleabane, a wildflower) (see Chapter 3, Affected Environment, Wildlife.)

Although wildlife is not abundant, a diversity of species is present. A number of bluffs and mesa edges in the SMA provide excellent nesting habitat for raptors, swallows, and swifts. Several stock ponds currently provide resting areas for migrating waterfowl. Scaled quail and mourning doves inhabit the brushy draws and rocky wooded hillsides. A few mule deer occupy the juniper-pinyon ecotype, and a small band of antelope ranges into the northwest corner of the SMA. Other wildlife common to the SMA include coyote, fox, rabbit, horned lark, raven, and kestrel. Bobcats have also been sighted in the SMA.

Within the area proposed for special management is the Querencia Watershed Study Area. This watershed is part of the Rio Puerco Hydrology Study which monitors hydrologic responses to the Rio Puerco grazing management programs. Only through such monitoring can a determination be made as to whether the objectives of the Rio Puerco Grazing ES (USDI, BLM 1978b) are being met.

The Las Milpas natural gas storage area, which is currently being operated by Southern Union Gas Company and the Gas Company of New Mexico in T. 15 N., R. 1 E., is also within the SMA. Initial injection and recovery wells were drilled to a depth of about 2,400 feet and were completed in the Agua Zarca Sandstone. Original plans called for peak storage of about 100 billion cubic feet. The surface of the storage area is highly developed with several miles of pipeline servicing numerous injection and recovery wells. Southern Union has unitized 7,680 acres although the present gas bubble is now estimated to occupy some 730 acres. Inadvertent penetration of this high pressure natural gas reservoir by locatable mineral developers could result in serious injury or death and substantial property loss.

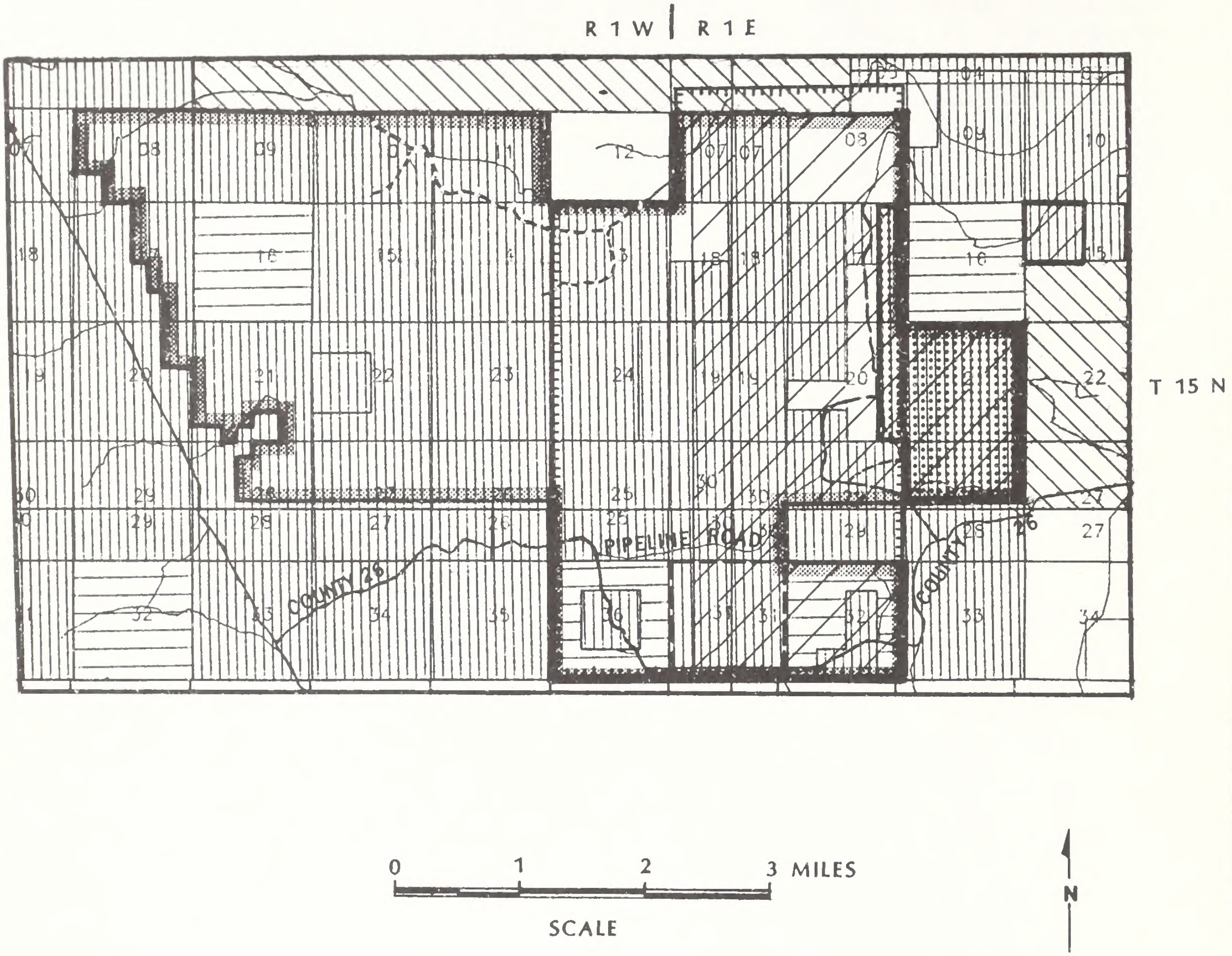
The cultural resource density within this SMA is particularly high, and includes Archaic, later prehistoric, and historic sites. Significant paleontological localities have also been found. The diversity in terrain provides varied and striking visual features. The portions of the Ojito SMA located within the Ojito WSA are currently being managed under the Interim Management Policy and Guidelines for Lands Under Wilderness Review (USDI, BLM 1979b).

In combination, the special features in the Ojito SMA provide exceptional scientific and educational potential by providing a natural setting in which to observe a wide variety of natural systems. The SMA is currently being used for environmental education classes by the Albuquerque Public Schools.

Management Objectives: Goals for the Ojito SMA include management emphasis on geologic, visual, cultural, paleontological, plant, and wildlife values; scientific study; and intensive recreation use, specifically semi-primitive non-motorized and semi-primitive motorized opportunity (see Appendix I). The Las Milpas gas storage area

(6,840 acres) would be managed as a geologic hazard. The effect of these actions would be to allow access for educational use and scientific study while at the same time prohibiting unnecessary and undue degradation associated with mineral development.

The planned actions include: (1) Designate as an Area of Critical Environmental Concern; (2) Develop an activity plan; (3) Allow no surface disturbance; (4) Limit motorized vehicle use to existing roads and trails; (5) Close the Querencia Watershed Study Area and Las Milpas pipeline and well areas to motorized vehicle use; (6) Close certain roads (except for authorized users)(see Map C-16); (7) Withdraw locatable minerals in the Las Milpas gas storage area; (8) Withdraw minerals in the Querencia Watershed Study Area.



MAP C-16
OJITO

SURFACE OWNERSHIP

STATE ☐

BLM ▥

PRIVATE ☐

INDIAN ▧

LAS MILPAS GAS STORAGE FACILITY ┴┴┴┴┴┴

SAN YSIDRO ANTICLINE ▦

QUERENCIA WATERSHED — — —

ALL MOTORIZED USE WITHIN BOUNDARY LIMITED TO EXISTING ROADS & TRAILS

PAVED OR GRADED ROAD ——

PRIMITIVE ROAD OR TRAIL ——

LIMITED TO AUTHORIZED USER — —

ROUTE CLOSED TO MOTORIZED VEHICULAR USE - - - - -

AREA CLOSED TO MOTORIZED VEHICULAR USE ▨

SMA BOUNDARY ▬

17. BALL RANCH

General Description: The Ball Ranch allotment (see Map C-17) was identified during the Rio Puerco RMP rare plant survey conducted by the New Mexico State Heritage Program, as containing unique communities of rare plants, geological and paleontological values (Knight 1983). The Nature Conservancy and the grazing allottees have expressed interest in the preservation of these communities.

Geologically, the Ball Ranch SMA is represented by Cenozoic conglomerates and gravels, and Mesozoic sandstones and clays. Paleontologically, there are extensive deposits of finely preserved petrified wood, deposits of bivalve marine shells, and most importantly, considerable quantities of Eocene mammal bones.

Botanically, this area contains significant populations of *Abronia bigelovii* (tufted sand verbena), on the State of New Mexico Heritage list of species of concern. These locales represent the only known sites of this species on BLM lands.

Astragalus feensis (Santa Fe milkvetch), on the State list of species of concern, is an endemic taxon known only from the area between Santa Fe and Albuquerque. It is represented by a rather large population in the northern portion of the Ball Ranch SMA. Here it is locally common on alluvial hills composed of sandy soil and fragments of metamorphic rock.

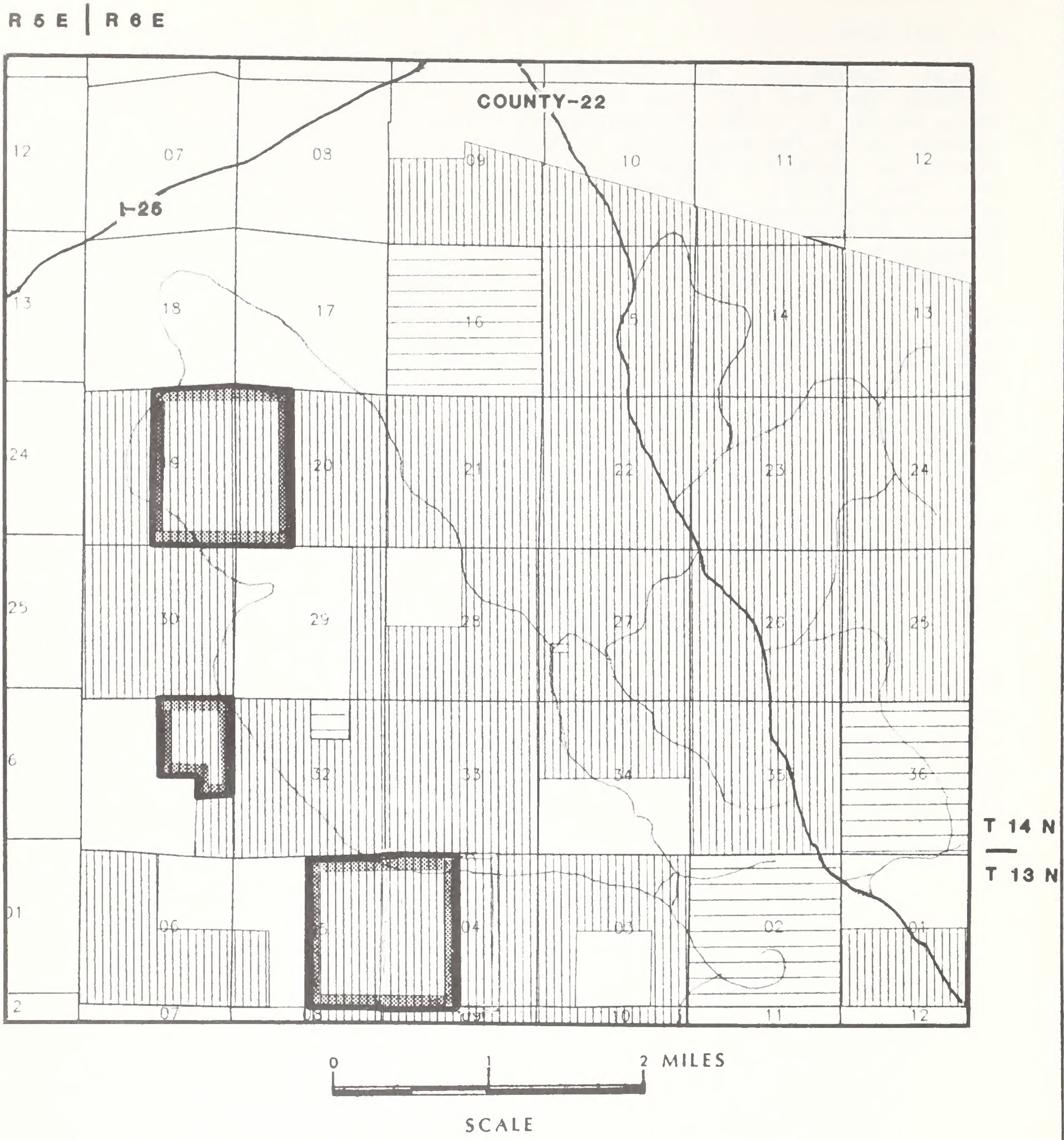
On the State list of species of concern, although locally common in several areas of central New Mexico, *Astragalus kentrophyta var. neomexicana* is represented by very large and healthy populations in the Ball Ranch SMA. These locales may represent some of the largest populations in the State. Within the study area this taxon is most common on sandy soils derived from the Galisteo Formation.

Oenothera caespitosa spp. navajoensis, also on the State list, is represented by a large healthy population in the southern portion of the study area. It is restricted to open barren knolls of Mancos clay and related shales. These locales represent the most eastern collection of this taxon presently known.

Pediocactus papyracanthus, grama grass cactus, on the State list and a Federal Register Category 2 species (see Table 3-3 in the Draft), is scattered throughout the study area on open desert grassland and clay badlands. The plants in these populations represent some of the largest and healthiest in the State (Knight 1983).

Management Objectives: Goals of management of the Ball Ranch SMA would emphasize rare plant habitat and paleontological values.

The planned actions include: (1) Designate as an Area of Critical Environmental Concern/Research Natural Area; (2) Develop an activity plan; (3) Limit motorized vehicle use to existing roads and trails; (4) Allow no surface disturbance; (5) Withdraw minerals.



MAP C-17
BALL RANCH

SURFACE OWNERSHIP

STATE ▤

BLM ▥

PRIVATE ▭

PAVED OR GRADED ROAD

PRIMITIVE ROAD OR TRAIL

SMA BOUNDARY ▩

ALL MOTORIZED USE WITHIN BOUNDARY LIMITED TO EXISTING ROADS & TRAILS

N

18. PRONOUN CAVE COMPLEX

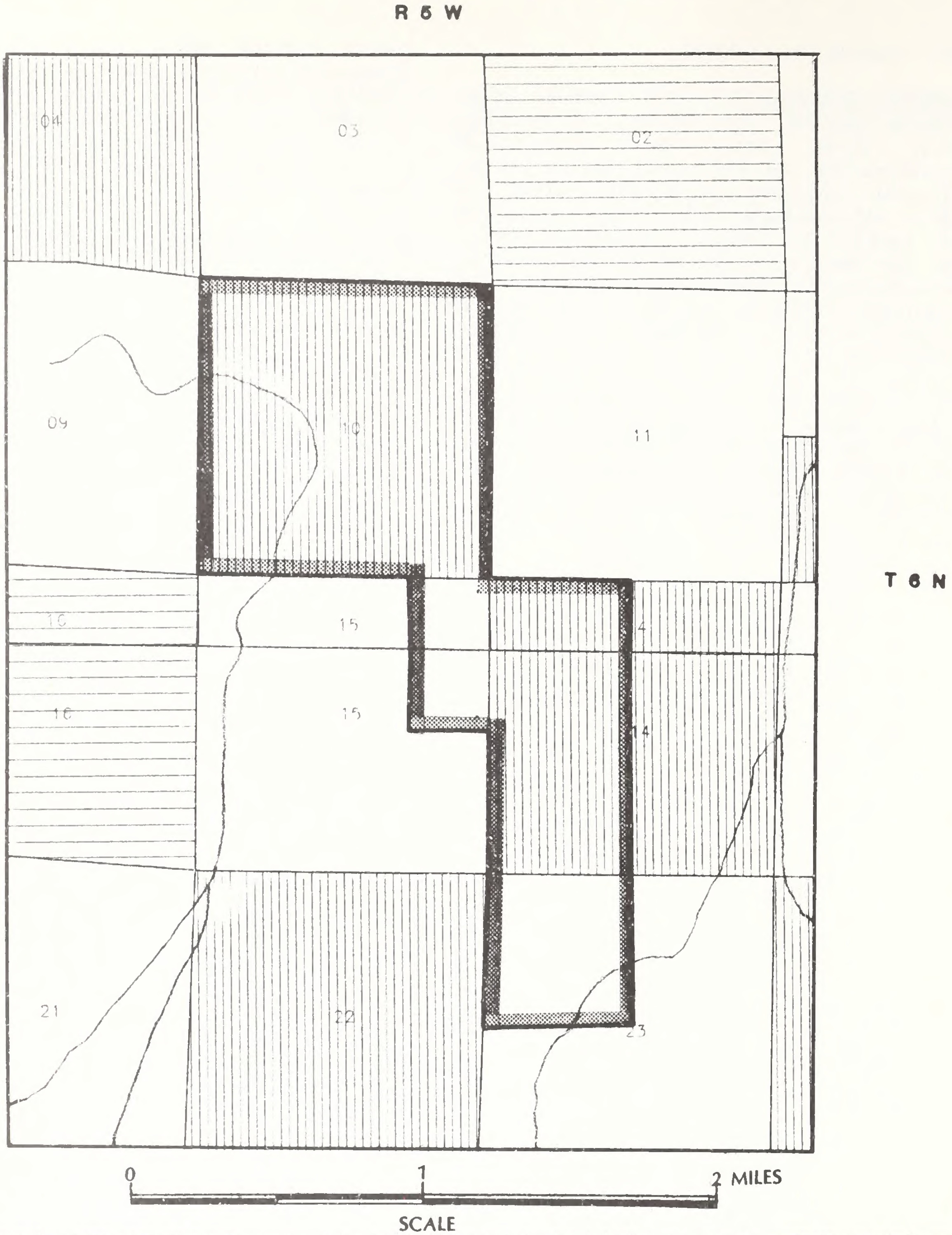
General Description: The Pronoun Cave Complex (see Map C-18) consists of the What Cave, Which Cave, That Cave, and approximately six additional caves. These vertical caves are particularly valued for their paleontologic resources as well as for habitat for several species of bats. The New Mexico Museum of Natural History has expressed interest in these scientific resources. Evidence of historic occupation exists, as well as remnants of prehistoric occupation.

The caves exhibit a late glacial paleontological fauna and contain a number of species whose range no longer includes New Mexico, such as the sagebrush vole. They also contain many other micro-faunal elements charasteristic of New Mexico's Ice Age.

Modern species using the caves include Townsend's big-eared bats which use the caves for hibernation. During the summer, the caves are populated by various species of little brown bats (Rick Smart, New Mexico Museum of Natural History, personal communication 1984).

Management Objectives: Management of Pronoun Cave Complex will primarily be for scientific and interpretive values.

The planned actions include: (1) Designate as an **Area of Critical Environmental** Concern/Research Natural Area; (2) Develop an activity plan; (3) Develop an agreement with the New Mexico Museum of Natural History; (4) Limit motorized vehicle use to existing roads and trails.



MAP C-18
PRONOUN CAVE COMPLEX

SURFACE OWNERSHIP

STATE	▒
BLM	▥
PRIVATE	☐

N ↑

PRIMITIVE ROAD OR TRAIL	─
SMA BOUNDARY	▓

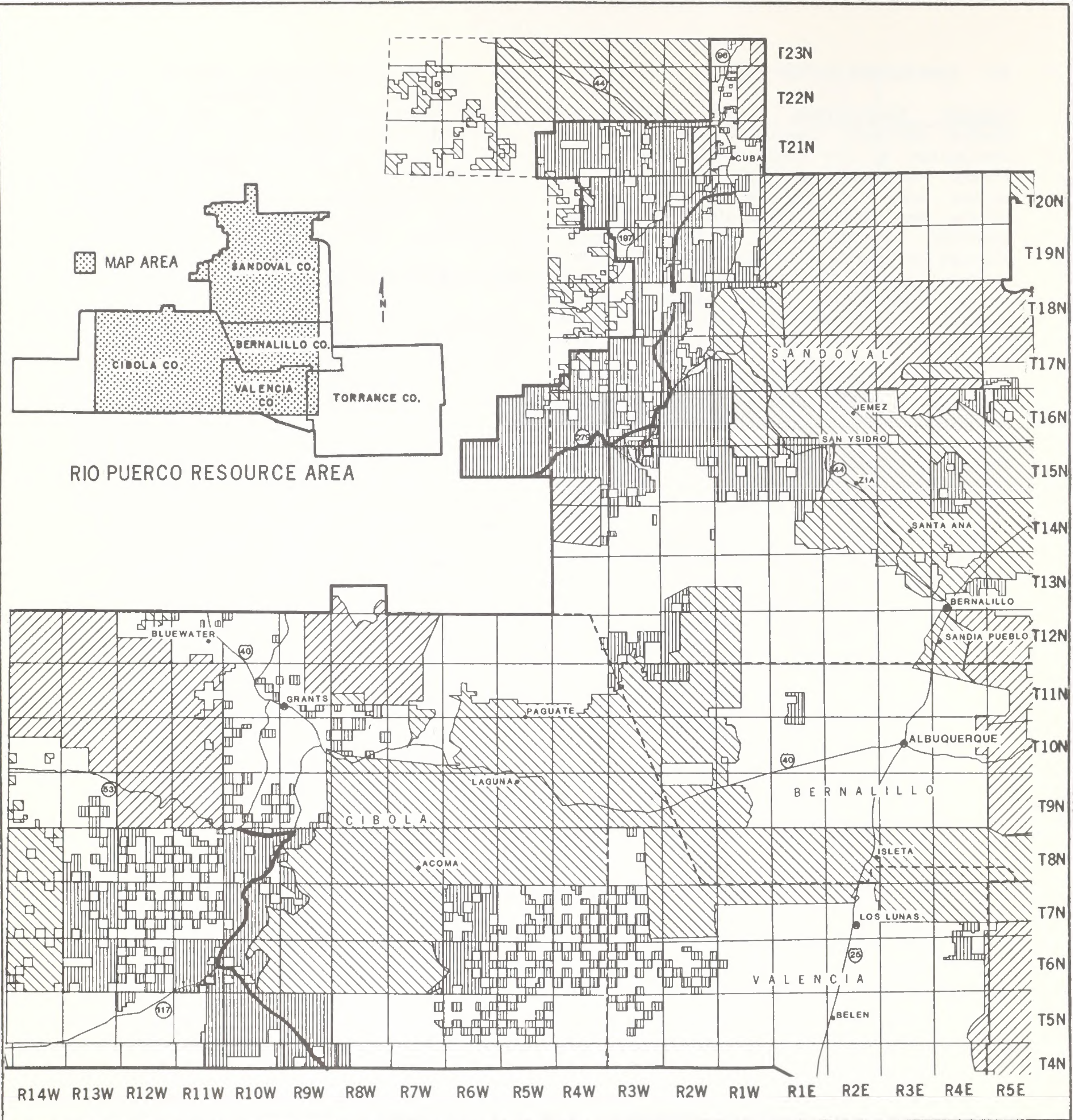
ALL MOTORIZED USE WITHIN BOUNDARY
LIMITED TO EXISTING ROADS & TRAILS

19. CONTINENTAL DIVIDE TRAIL

General Description: The Continental Divide National Scenic Trail has been designated by the Congress of the United States. A scenic corridor fifty miles on either side of the actual Continental Divide has been established, with the treadway for the trail to be proposed through the planning of the respective land managing agency, and reviewed and approved by the Continental Divide Trail Advisory Council. The treadway proposed in this RMP parallels New Mexico State Roads 279 and 117 and BLM Inventory Road 16-4-25 for approximately 62 miles (see Map C-19). It traverses a wide variety of topography, including rolling grasslands, pinyon-juniper and ponderosa pine covered mesas, retreating escarpments, extensive lava flows, and spectacular sandstone bluffs. In addition it skirts the Cabezon and Ignacio Chavez SMA's, travels through the Rimrock, Little Rimrock, and Sand Canyon WSA's, as well as traversing the center of the El Malpais SMA. The treadway also crosses the 1870's Wagon Road Trail SMA. A wide variety of opportunities exist for additional side trails and interpretive services because of the significantly contrasting ecosystems being traversed. These would be considered during the activity planning stage.

Management Objectives: Management of the Continental Trail SMA would emphasize Continental Divide National Trail objectives established by the Continental Divide Trail Advisory Council and intensive recreation management. The RPRA would coordinate and cooperate with all involved public and private landowners.

The planned action is: Develop an activity plan.



MAP C-19
CONTINENTAL DIVIDE TRAIL

LEGEND

CONTINENTAL DIVIDE TRAIL	〰
PUBLIC LANDS	▥
FOREST SERVICE	▨
INDIAN RESERVATION	▧
RESOURCE AREA BOUNDARY	—
COUNTY BOUNDARY	- - - - - -

N

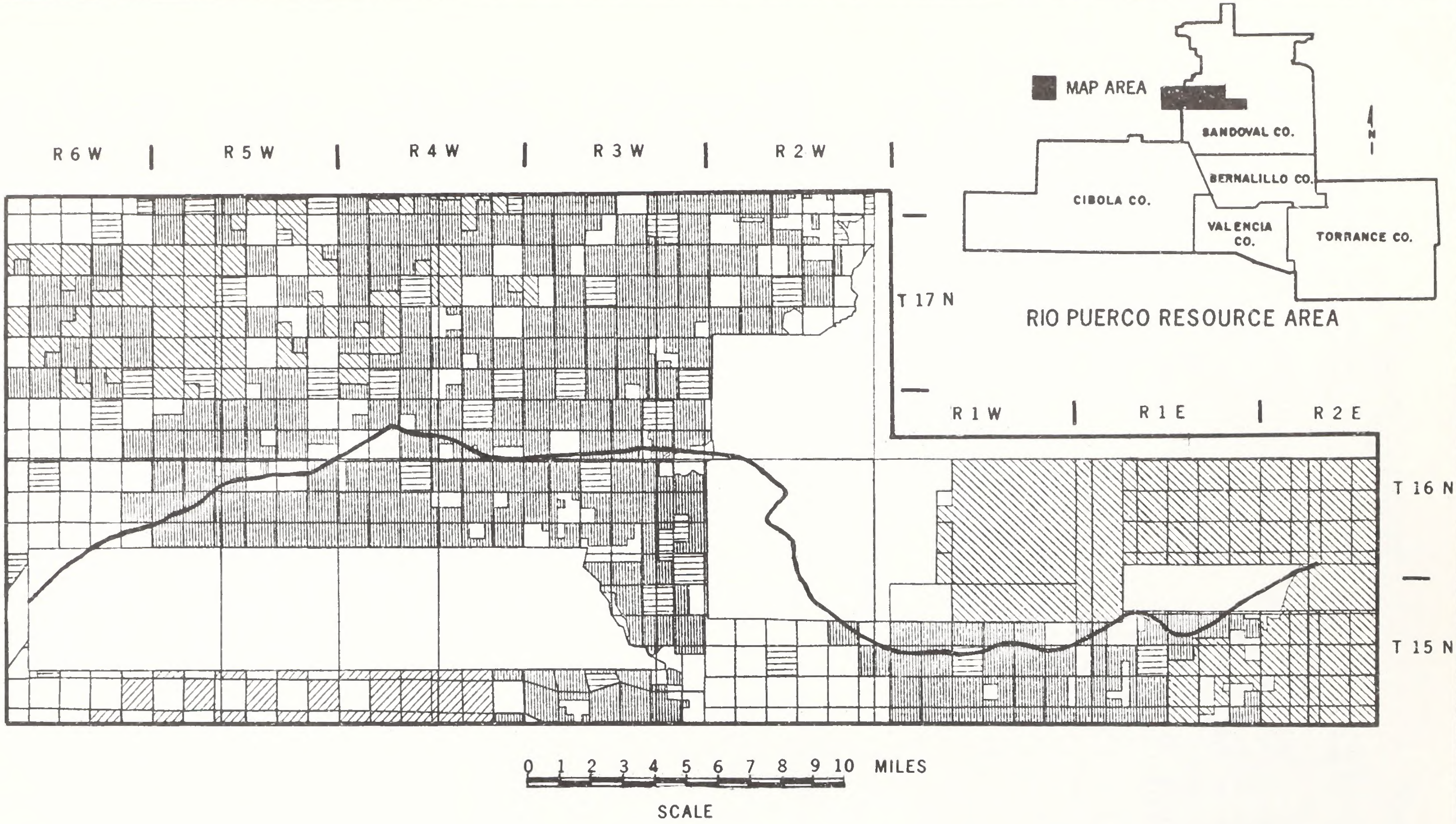
0 1 2 3 4 5 6 MILES
SCALE

20. 1870'S WAGON ROAD TRAIL

General Description: The 1870's Historic Wagon Road SMA (see Map C-20) traverses approximately 49 miles of the RPRA, and skirts the Ojito, Cabezon Peak, Ignacio Chavez, and Azabache Station SMA's. It was the main route linking Santa Fe with Fort Wingate in the early 1900's and was used for both supplies and troops. The trail was also used extensively as a wagon freight road, Star Route mail line, and for passenger coaches.

Management Objectives: Goals for the 1870's Wagon Road Trail SMA emphasize management for historic interpretive values and intensive recreation use.

The planned actions include: (1) Develop an activity plan; (2) Limit to pedestrian and equestrian use; (3) Develop an agreement with the State of New Mexico; (4) Arrange for inclusion in the New Mexico Trails System.



MAP C–20
1870'S WAGON ROAD TRAIL

SURFACE OWNERSHIP

STATE ▤

BLM ▥

PRIVATE ☐

INDIAN ▧

USFS ▨

WAGON ROAD TRAIL ~

N

21. EL MALPAIS

General Description: El Malpais lava field and neighboring public lands (see Map C-21) include hundreds of thousands of acres of cinder cones, lava tubes, ice caves, sculptured sandstone formations, and ponderosa pine forests. El Malpais (the badlands) is the historic Spanish name given to the lava field, and in view of the brutally rugged nature of the terrain it is an accurate description.

Bounded by high sandstone bluffs and cliffs and sandhill country on the east, and by the appropriately named "Chain of Craters" on the west, El Malpais is an outstanding example of volcanic landscape. El Malpais consists of four distinct lava flows, which were spewed over the McCarty's Valley at different times over the last 3,000 years. Based upon archaeological evidence the most recent flows have been dated at less than 1,000 years in age.

The El Malpais SMA will consolidate a series of overlapping special designations. Portions have been designated as follows: (1) Wilderness Instant Study Area being recommended for wilderness designation, (2) four Wilderness Study Areas, (3) Outstanding Natural Area, (4) Natural Environmental Area, (5) National Natural Landmark, and (6) Chaco Archeological Protection Site. The majority of the SMA is currently being managed under the Interim Management Policy and Guidelines for Lands Under Wilderness Review (USDI, BLM 1979b). Wildlife values for a portion of the SMA are being managed according to the objectives outlined in the El Malpais Habitat Management Plan (USDI, BLM 1981d).

Because of the interesting combination of ecotypes existing in the El Malpais SMA, it contains a wide variety of plant and animal life. Major wildlife species include deer, antelope, Abert's squirrel, turkey, and band-tail pigeons. The sandstone bluffs to the east contain a good nesting population of raptors including golden eagles, red-tailed hawks, and prairie falcons. It has also been identified as crucial bald eagle habitat. Collapsed lava tubes provide ideal habitat for kestrels and great horned owls. Peregrine falcons migrate through the SMA.

A unique phenomenon of El Malpais is the stunting of ponderosa pine trees in certain places. The species grows normally on sites adjacent to the lava, but harsh growing conditions in certain places within the area cause a picturesque dwarfing of the plants to occur.

Recent surveys have revealed plants in El Malpais which are unique in New Mexico. Two plants, Asplenium septentrionole (grass fern) and Asplenium trichomanes (maidenhair spleenwort) are widespread in the SMA, but quite uncommon throughout the western United States. Another plant, Carex pityophylla, a rare sedge found in southern Colorado, Utah, and New Mexico, was recently discovered growing in a vigorous colony.

The El Malpais SMA has been inhabited since PaleoIndian times (at least 10,000 years ago), and possesses numerous archaeological sites. One area of particular significance is the Candelaria Ruin and community. This site, originally known as "Las Ventanas," is a Chacoan outlier. The main site itself is relatively small but contains a tower kiva within its roomblock. An isolated great kiva is located just southeast of the ruin and segments of a related prehistoric road run from the main roomblock in a northeasterly direction. The surrounding area contains evidence of surface recontouring and two pueblos of thirty to sixty rooms, in addition to numerous small and single room structures and other undefined features. This site is one of two identified in the Joint Management Plan for the Chaco Archeological Protection Site System (USDI, NPS 1984) as particularly suitable for development as an interpretive site.

The El Malpais SMA is very popular for recreation opportunities ranging from primitive to roaded natural (see Appendix I), and has received attention for these values from such varied publications as Backpacker Magazine, Sunset Magazine, and New Mexico Magazine. Additionally, several freelance writers and photographers have recently submitted material on El Malpais for publication.

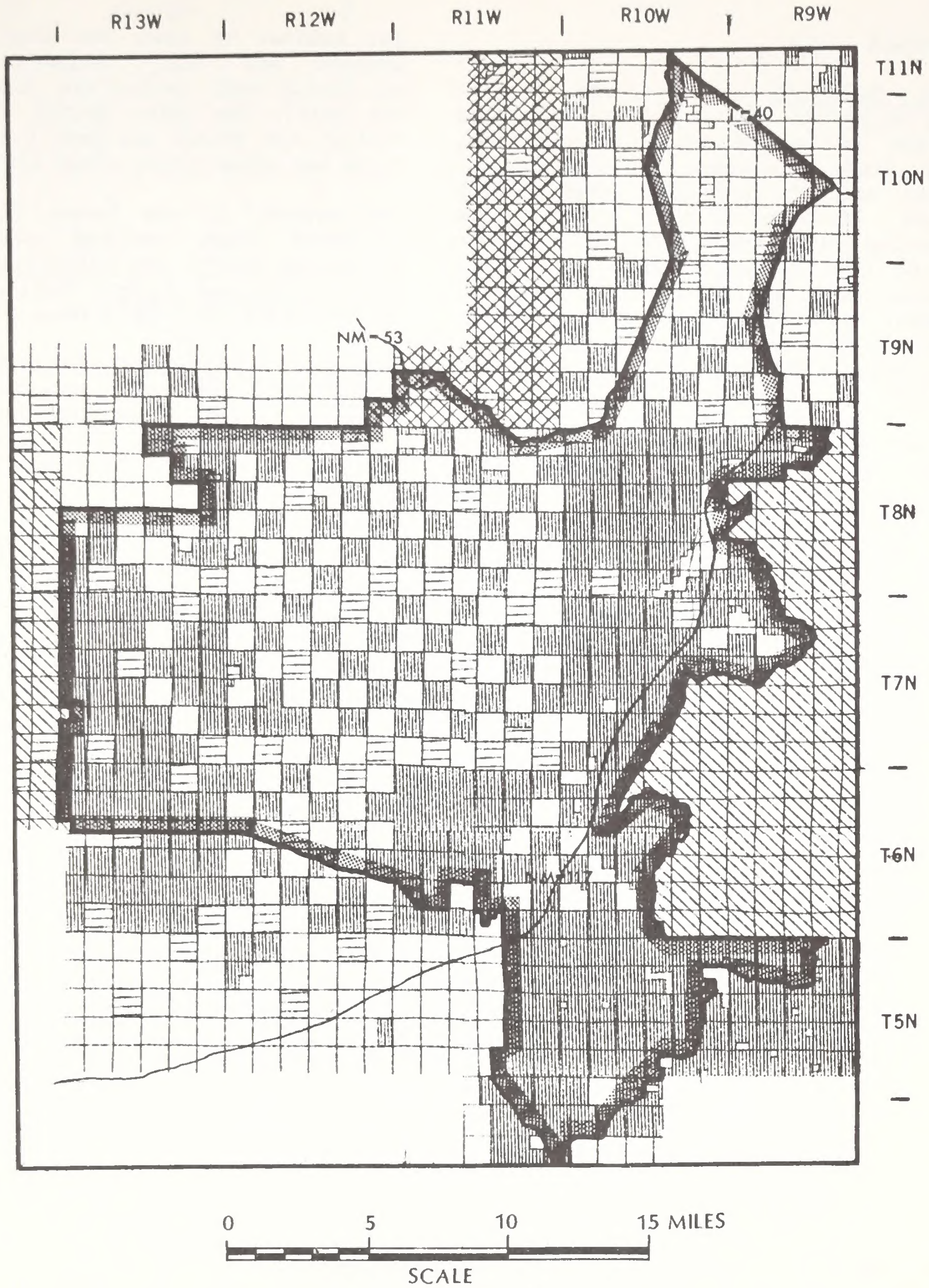
Management Objective: Management of the El Malpais SMA will consolidate the existing planned actions of the El Malpais Habitat Management Plan (USDI, BLM 1981d), El Malpais Recreation Area Management Plan (USDI, BLM 1982a), Draft Management Proposal for Visitor Use of the Malpais Region Scenic Corridor: New Mexico State Road 117 (USDI, BLM 1984b), and the Joint Management Plan for the Chaco Archaeological Protection Site System (USDI, NPS 1984). The objectives of the National Natural Landmark Program and the

BLM Wilderness Management Policy (USDI, BLM 1981g), if Congress designates any portion of the SMA as Wilderness, will also be considered. Fuelwood cutting within the El Malpais SMA as delineated in the Divide Management Framework Plan (USDI, BLM 1983b) will continue subject to the Interim Management Policy and Guidelines for Lands Under Wilderness Review (USDI, BLM 1979b).

Candelaria Ruin and community will be managed under the cultural resource scientific and conservation goal category designations (see Appendix K). This will allow further approved scientific study while maintaining existing conditions until a comprehensive management plan is completed.

In summary, management of the El Malpais SMA will emphasize protection of wildlife habitat, visual values, cultural values, scientific/interpretive values, and intensive recreation use, specifically **primitive**, semi-primitive non-motorized, semi- primitive motorized, and roaded natural recreation opportunity (see Appendix I).

The planned actions include: (1) Develop activity plans; (2) Limit motorized vehicle use to existing roads and trails; (3) Acquire mineral estate.



MAP C-21
EL MALPAIS

SURFACE OWNERSHIP

STATE	▤
BLM	▥
PRIVATE	☐
INDIAN	▧
USFS	▩

PAVED OR GRADED ROAD	——
SMA BOUNDARY	▒

ALL MOTORIZED USE WITHIN BOUNDARY LIMITED TO EXISTING ROADS & TRAILS (SEE MAP 2-5)

22. PETACA PINTA

General Description: Landforms in the Petaca Pinta SMA (see Map C-22) vary from grassland to rugged mesas and canyons. Petaca Pinta dominates the SMA. This isolated mountain-like mesa rises a near vertical thousand feet above the surrounding landscape. Blue Water Canyon (not the same Bluewater Canyon as in the Bluewater ACEC), in the southwest corner of the area, is a deep, sheer-walled canyon. The area also contains a maze of smaller box canyons, a badlands environment, and a lava flow.

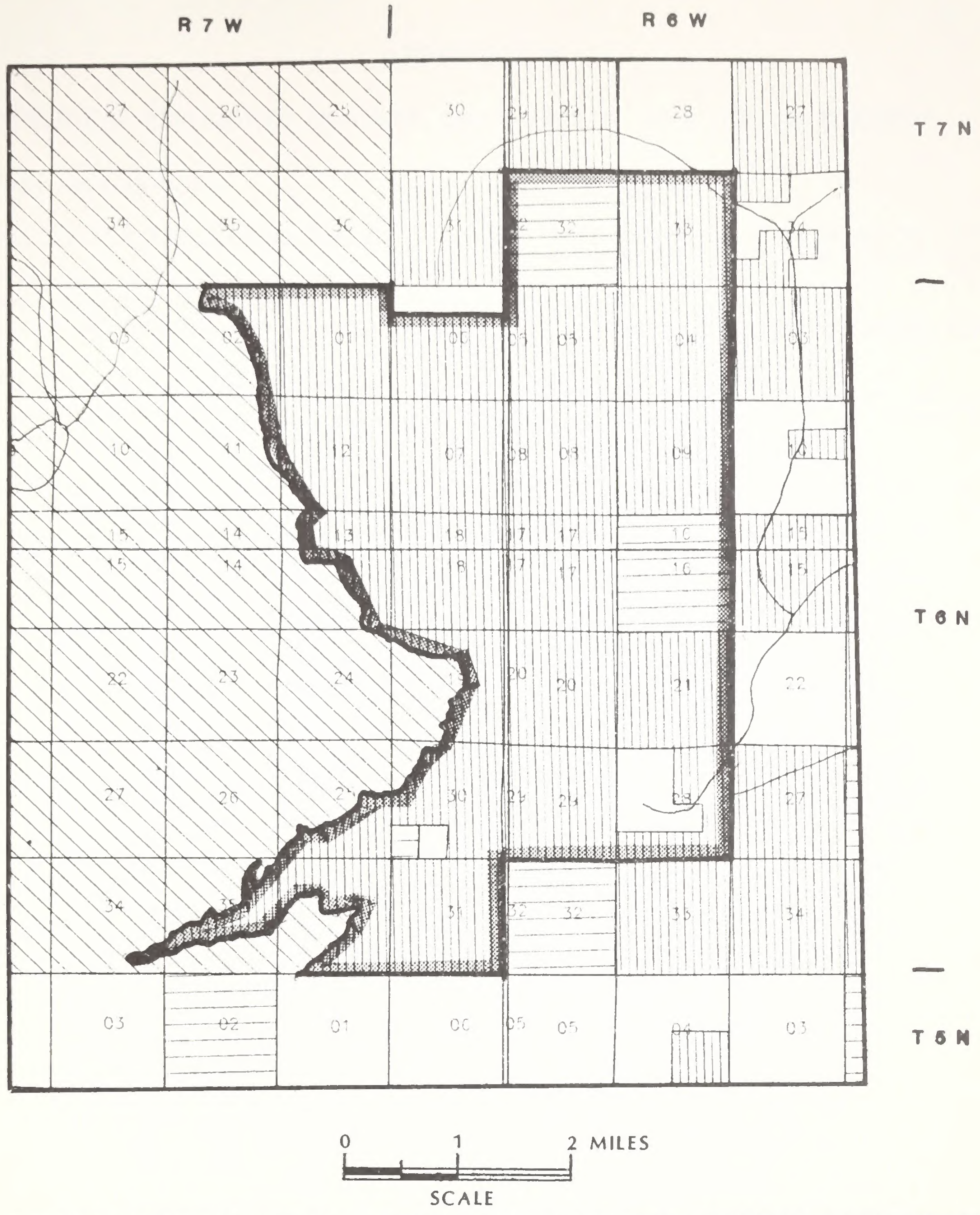
The lower elevation lands are dominated by various species of grama grasses, most notably blue and sideoats gramas. Other low elevation species include bear grass, yucca, and cholla. The higher elevations support pinyon and one-seed juniper. Gambel's oak of considerable size and age occur in Blue Water Canyon and in other canyons within the unit. A limited number of ponderosa pine grow at the highest elevations on the rimrock of Blue Water Mesa on the west.

The habitat is good for deer but their numbers are low. Golden eagle and red-tailed hawk eyries are present within the unit. The rocky bluffs also provide habitat for bobcat and grey fox. Mountain lions may occasionally range into the SMA.

The majority of the Petaca Pinta SMA is currently being managed under Interim Management Policy and Guidelines for Lands Under Wilderness Review (USDI, BLM 1979b) as the Petaca Pinta Wilderness Study Area.

Management Objectives: Management of the Petaca Pinta SMA will emphasize intensive recreation use, specifically primitive recreation experience (see Appendix I) and enhancement of wildlife habitat and visual values.

The planned actions include: (1) Develop an activity plan; (2) Limit motorized vehicle use to existing roads and trails; (3) Acquire mineral estate.



MAP C-22
PETACA PINTA

SURFACE OWNERSHIP

STATE ▭

BLM ▥

PRIVATE ▭

INDIAN ▨

N ↑

PRIMITIVE ROAD OR TRAIL ——

SMA BOUNDARY ▩

ALL MOTORIZED USE WITHIN BOUNDARY
LIMITED TO EXISTING ROADS & TRAILS

APPENDIX K

CULTURAL RESOURCES CLASSES, GOAL SYSTEM, AND USE CATEGORIES

ADDITIONS AND CORRECTIONS

Cultural Resource Site Classes, Page K-1

The first sentence in the section entitled "Cultural Resource Site Classes" on page K-1 should be replaced with the following text:

> These are general classes of cultural resource sites in which all known and projected prehistoric and historic sites in the RPRA can be placed. These consist of four chronological classes that roughly parallel traditional Southwestern cultural distinctions, and an "Unknown" class. These classes are as follows:

Table K-1, Page K-2

The first line in the first column of Table K-1 on page K-2 should read "PaleoIndian (2%)."

Cultural Resource Use Category System, Page K-4

The second sentence of the section entitled "Cultural Resource Use Category System" on page K-4 should read:

> This step or allocation commitment comes after the completion of the RMP which establishes the general management goals for a particular site or, more commonly, combination of sites.

Glossary

GLOSSARY

ADDITIONS AND CORRECTIONS

Public land - Lands whose surface **and/or subsurface** is administered by the Bureau of Land Management.

Transmission Line - Any electrical transmission line of 69 kV capacity or greater or any **pipe** line of 6-inch diameter or greater.

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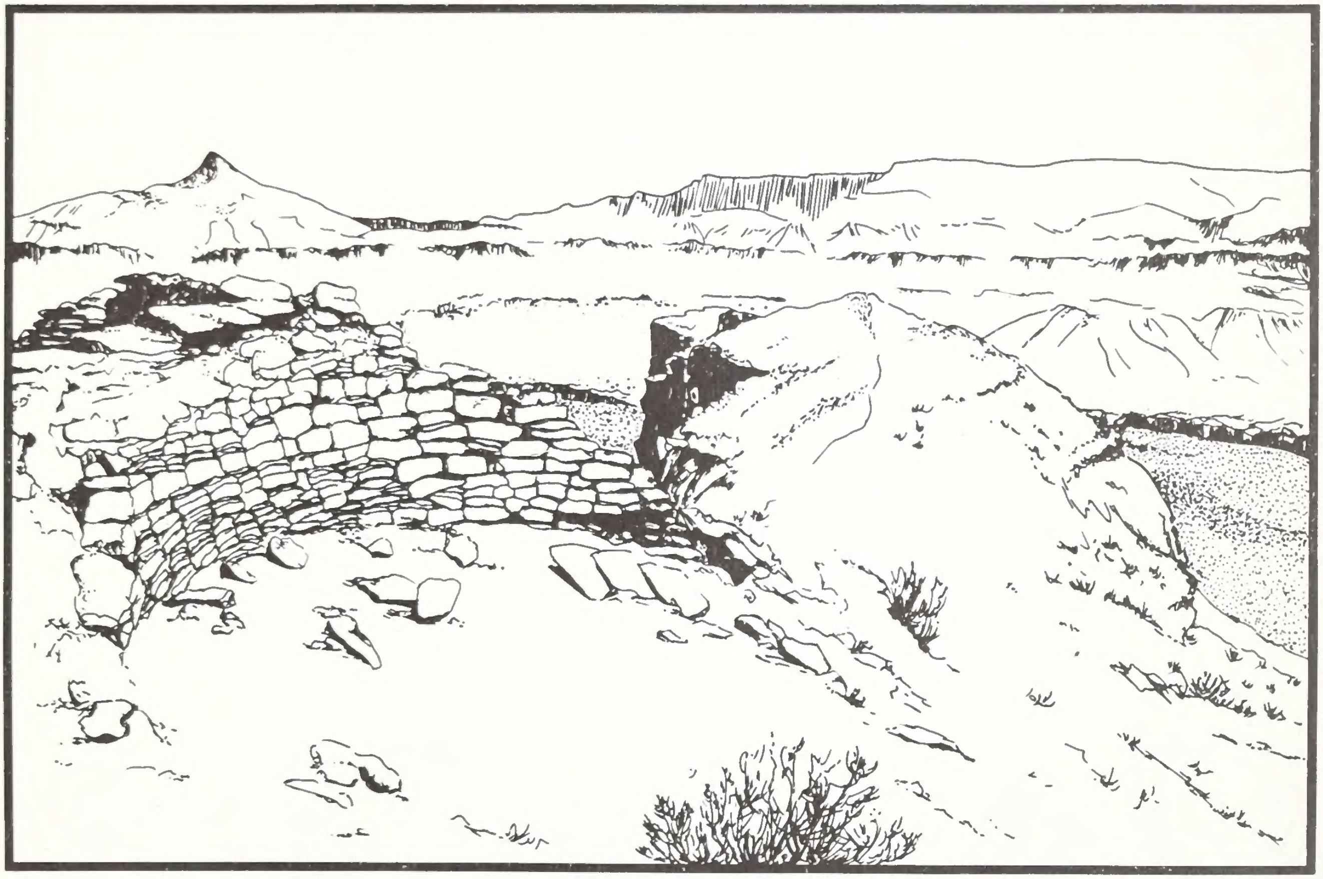

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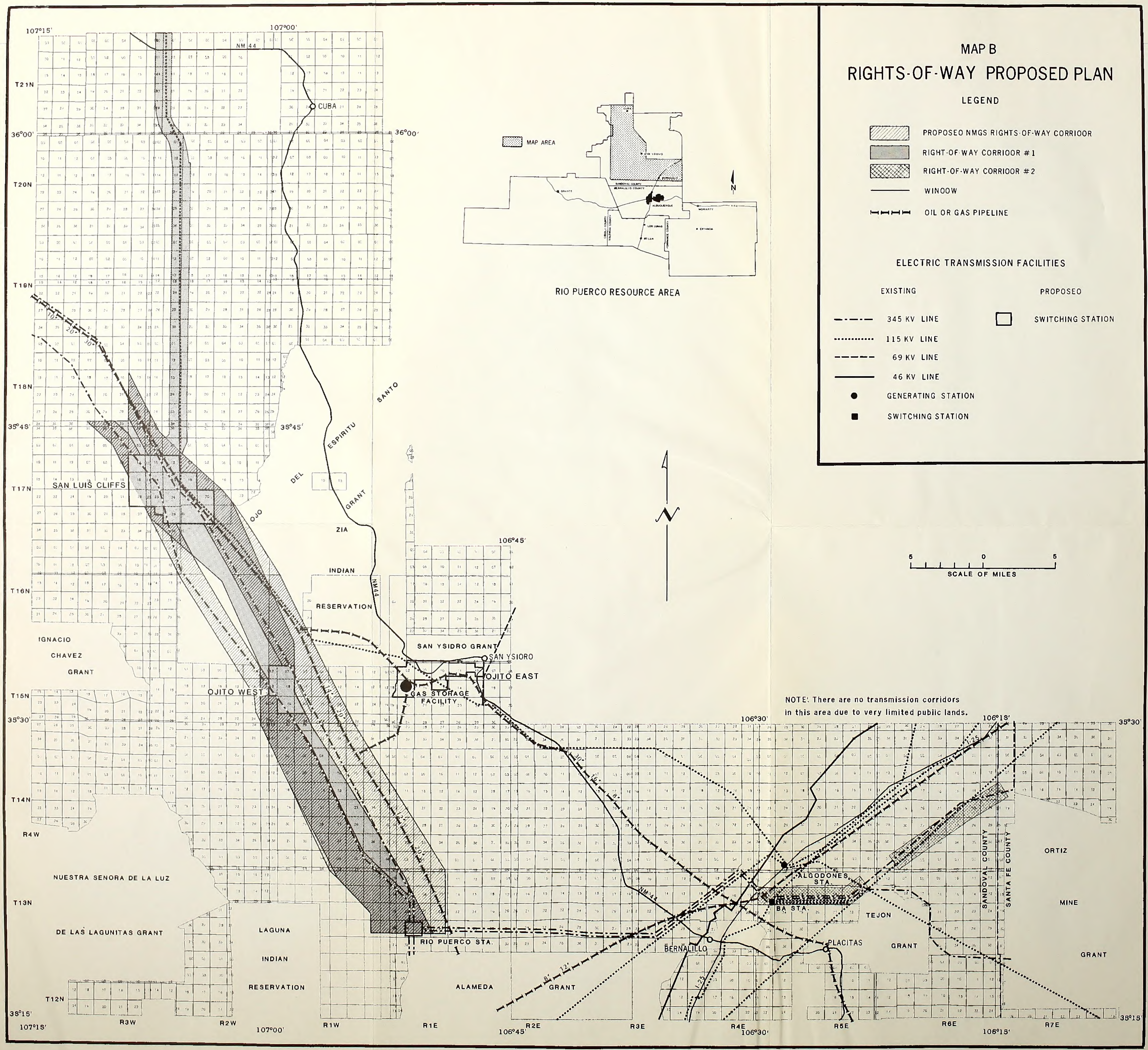

MAP B
RIGHTS-OF-WAY PROPOSED PLAN

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